



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities

OFFICE OF THE COMMISSIONER
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July 7, 2026

AMATS Policy Committee
Anchorage Metropolitan Area Transportation Solutions
4700 Elmore Road
Anchorage, Alaska 99507

Dear Chair and Members of the AMATS Policy Committee:

During the June 30 meeting with Federal Highway Administration (FHWA) Administrator Sean McMaster, representatives of FHWA, the Alaska Department of Transportation and Public Facilities (DOT&PF), the Municipality of Anchorage, and AMATS discussed two matters requiring continued coordination: (1) expansion of the AMATS Metropolitan Planning Area (MPA) boundary and (2) inclusion of the Safer Seward Highway Project in the Metropolitan Transportation Plan (MTP).

Metropolitan Planning Area Boundary

Federal law requires the MPA boundary to be established by agreement between the MPO and the Governor. At a minimum, the boundary must include the Census-defined urbanized area and contiguous areas expected to become urbanized within the 20-year planning horizon. While federal regulations allow a broader planning area, they do not require one. DOT&PF supports updating the boundary to comply with federal requirements and appreciates the work that AMATS has done to develop its proposal. The Department's ongoing discussions with AMATS staff and the Technical Advisory Committee are intended to ensure that any expansion beyond the minimum required boundary is supported by a clear and documented planning rationale that reflects anticipated growth, transportation needs, and sound regional planning principles. We appreciate the constructive dialogue to date and remain confident that continued collaboration will lead to an agreement that serves the long-term interests of the Anchorage region.

Safer Seward Highway Milepost 98.5-118

The second topic concerned the absence of the Safer Seward Highway Project, Milepost 98.5–118, from the AMATS MTP.

The Department understands the concern expressed by some Policy Committee members and stakeholders that a project of this scale could affect the timing or availability of resources for other transportation priorities within Anchorage. However, the Department's experience is that funding availability is only one part of the challenge. Environmental review, utility coordination, right-of-way acquisition, permitting, and overall project readiness can also constrain the region's ability to obligate available federal funds and deliver priority transportation improvements on schedule.

"Keep Alaska Moving."

To address those challenges, DOT&PF and the Municipality have expanded coordination on project development and delivery. Recent examples include completion of the Seward-to-Glenn Planning and Environmental Linkages (PEL) Study, continued advancement of the Ingra-Gambell improvements, utility undergrounding beginning this summer, funding coordination to support municipal delivery of the Downtown Transit Center, and ongoing discussions regarding the potential transfer of ownership of 5th and 6th Avenues and I and L Streets to the Municipality. These efforts demonstrate that strong state and local partnerships improve project delivery and increase our collective ability to advance transportation improvements throughout the Anchorage region.

The Safer Seward Highway Project should also be viewed within the context of Alaska's Traffic Safety Corridor Program established under AS 19.10.075. Since 2006, four Traffic Safety Corridors have been designated in Alaska: the Seward Highway, Parks Highway, Sterling Highway, and Knik-Goose Bay Road. Significant investments have been made to improve safety on these corridors, and the Safer Seward Highway Project represents a remaining significant corridor investment within that longstanding statewide safety initiative.

Given the project's regional and statewide significance, and its continued advancement through the National Environmental Policy Act process, the Department respectfully requests that the AMATS Policy Committee restore the Safer Seward Highway Project to the MTP for its full original project limits, from Milepost 98.5 to Milepost 118. Inclusion of the full Milepost 98.5–118 project limits in the MTP would preserve the integrity of the project development process, maintain eligibility for future funding consideration, and avoid creating an artificial planning break within a continuous safety corridor. Restoring the project in full would not predetermine final design, construction phasing, environmental outcome, or future funding decisions. It would allow the full corridor to remain within the established transportation planning process while DOT&PF, AMATS, the Municipality, FHWA, and stakeholders continue to coordinate on project scope, phasing, funding, and environmental review.

Attachment A provides the Department's preliminary responses to the Policy Committee and staff comments submitted on the Draft Environmental Assessment.

Looking Forward

The Department recognizes that transportation safety challenges continue to evolve, particularly within Alaska's urban areas. Improving pedestrian safety, reducing serious injury crashes, and delivering multi-modal transportation improvements will require continued partnership among the State, the Municipality of Anchorage, AMATS, FHWA, and our public safety partners. While perspectives may differ on individual projects, our shared objective remains the same: delivering a safer, more reliable, and better-connected transportation system for Alaskans. The Department is committed to continuing this collaborative approach as we work together to improve safety, deliver transportation projects more efficiently, and responsibly invest public resources. DOT&PF appreciates the important role the Policy Committee plays in shaping that future and looks forward to continuing our partnership.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ryan Anderson', with a stylized flourish at the end.

Ryan Anderson, P.E.

Commissioner

Alaska Department of Transportation and Public Facilities

Attachments

Attachment A – DOT&PF Responses to AMATS Policy Committee and Staff Comments on the Draft Environmental Assessment

cc:

Sean McMaster, Administrator
Federal Highway Administration

Mayor Suzanne LaFrance
Municipality of Anchorage

Aaron Jongenelen, Executive Director
AMATS

MEMORANDUM

STATE OF ALASKA

Department of Transportation & Public Facilities



TO: Project File

DATE: July 7, 2026

FROM: Safer Seward Highway Project Team

SUBJECT: Responses to AMATS Policy Committee on the Draft Environmental Assessment

The Alaska Department of Transportation & Public Facilities (DOT&PF) appreciates the thoughtful review and constructive feedback provided by the Anchorage Metropolitan Area Transportation Solutions (AMATS) Policy Committee (PC) and AMATS staff during public review of the Draft Environmental Assessment (EA) for the Safer Seward Highway Project.

The purpose of this memorandum is to document the Department's preliminary responses to the AMATS comments provided during review of the Draft Environmental Assessment. Because the comments address a Draft EA, these responses are based on the technical analyses, design information, agency coordination, and project record available at this stage of environmental review. Responses may be refined, updated, or supplemented as DOT&PF completes the Final EA, incorporates additional technical analysis, responds to substantive public and agency comments, and advances design development. Final responses to substantive comments and any resulting revisions to the environmental document will be included in the Final EA, as appropriate.

The AMATS PC formally adopted the AMATS staff comments and supplemented them with four additional policy comments in its February 20, 2026 correspondence. This memorandum provides the Department's preliminary responses to those comments in advance of completion of the Final EA. Final responses to all substantive comments received during the Draft EA public review period, including revisions made to the environmental document where appropriate, will be included in the Final EA in accordance with the National Environmental Policy Act (NEPA) and the DOT&PF Environmental Procedures Manual.

For clarity, this memorandum is organized into two sections:

- Section 1 – Responses to AMATS PC Comments
- Section 2 – Responses to AMATS Staff Comments

Section 1 responds to the four policy comments adopted by the AMATS PC that address transportation funding priorities, project delivery, alternatives evaluation, and the traffic safety analysis.

Section 2 responds to the technical comments submitted by AMATS staff.

The numbering in this memorandum corresponds to the original AMATS PC and AMATS staff comment letters to facilitate cross-reference. Where appropriate, the Final EA will incorporate revisions or clarifications resulting from these comments. This organization is intended to improve readability and does not alter the Department's responses or the original numbering used by AMATS.

The Department appreciates the time and effort devoted by both the PC and AMATS staff in reviewing the Draft EA. The comments have helped improve the clarity of the environmental document and supporting technical analyses.

Section 1

Responses to AMATS PC Comments

The following responses address the policy-level comments submitted by the AMATS PC during review of the Draft EA for the Safer Seward Highway Project. The PC adopted the AMATS staff comments and also provided additional comments regarding transportation funding priorities, alternatives evaluation, and traffic safety methodology.

1.1 Adoption of AMATS Staff Comments

Corresponds to AMATS PC Comment 1

Comment

The AMATS PC met on February 19, 2026, during the comment period for the Draft EA for the Safer Seward Highway Project and voted to adopt the AMATS Staff comments on the draft EA, as PC comments. They requested an official and comprehensive response from the Project team to all comments provided. They also voted to include additional comments made by AMATS Technical Advisory Committee and PC members.

Department Response

The Department appreciates the review provided by the AMATS PC and acknowledges the Committee's adoption of the AMATS staff comments. This memorandum provides the Department's preliminary responses to both the PC and staff comments. Consistent with the NEPA process, final responses to all substantive comments, including any revisions to the Draft EA, will be included in the Final EA in accordance with the DOT&PF Environmental Procedures Manual.

1.2 Transportation Funding Priorities and Project Delivery

Corresponds to AMATS PC Comment 2

Comment

Chair Coy: The critical part is the recognition that there are so many safety needs not getting addressed in a way he and many others feel is adequate. Seeing so much effort put into the Seward Highway—when there are so many other urgent needs - that he is spending so much time on even though it is not his system, it is very challenging and draining. He emphasized that there needs to be more motion, more effort, and more prioritization of all the other safety needs, rather than on a stumbling block, such as a lane drop directive, and other things that further slow projects down. There is only so much the Municipality can do to improve safety in ways we

view as our jurisdiction when they are on DOT&PF streets. With DOT&PF restructuring it feels like the ability for the Municipality to improve safety – something we are feeling the weight of with everything going on—is moving away from us. Seeing something outside of AMATS gaining billions of dollars is really challenging. He understands that DOT&PF is trying to make project improvements and deliver Anchorage projects, but the committee also continually hears about DOT&PF not having enough staff to move AMATS projects forward. All the other projects listed above are not ones that can be fixed by adding capacity and by expanding the roadways, which is what the Safer Seward Highway Project is looking at proposing. It seems so much easier to move forward with big projects that are expansions than it does to move forward with projects that are targeting safety and reallocating space. It seems like there is a huge discrepancy between these types of projects and those types of projects. It is hard when he sees curb-tight sidewalks and roads that have excess capacity that increase speeding and operate at a level of service that is at so much excess capacity. 85% of the major streets in Anchorage are DOT&PF streets.

Member Babb: From the Planning Department's point of view on these sorts of projects, especially based on the Planning & Zoning Commission's reaction to this project, she concurred with Chair Coy. Our community is consistently asking for walkable streets and non-motorized transportation, but we are consistently not able to deliver that in town.

Department Response

DOT&PF recognizes the Committee's concern regarding the pace of transportation safety improvements within the Anchorage metropolitan area. The Department continues to work closely with the Municipality of Anchorage and AMATS to improve project delivery through earlier utility coordination, right-of-way acquisition, environmental review, and collaborative project development. Recent examples include the ongoing Seward-to-Glenn Planning and Environmental Linkages (PEL) Study, advancement of the Ingra-Gambell corridor improvements, continued coordination on the 5th and 6th Avenue (I & L) relinquishment, and the transfer of funding to support the Municipality's Transit Center project. These efforts are intended to increase the number of transportation improvements delivered throughout the AMATS area while continuing to advance statewide safety investments.

The Safer Seward Highway Project is planned to be delivered in multiple phases over approximately 15 to 20 years, consistent with the Department's approach to other major highway improvements, including the Sterling Highway MP 45–60 project and previous phased improvements to the Seward Highway between 36th Avenue and O'Malley Road. Phased delivery allows the Department to balance construction impacts, available funding, and statewide transportation priorities while continuing to advance other projects.

Transportation funding priorities are established through the Statewide Transportation Improvement Program (STIP) process, which provides ongoing opportunities for public and agency input.

Project funding decisions are outside the scope of the NEPA environmental review process.

1.3 Alternatives Evaluation Methodology

Corresponds to AMATS PC Comment 3

Comment

Member Baldwin Day: Appendix D (Alternatives Development) sections describing the Stacked Structure (1.1) and Tunneling Through Curves (1.2) alternatives include discussion of projected costs per linear foot, impact on scenic quality, and environmental considerations. These metrics are entirely absent from the section on Intermittent Passing Lanes (Three-Lane) Divided Highway (1.3). Please explain why critical metrics such as project cost, long- and short-term wildlife and environmental impacts, Section 4(f) considerations, traffic disruption during construction, multimodal access & safety, recreation access, and compatibility with existing state planning documents were not transparently evaluated and scored for all proposed alternatives and weighted alongside crash rates & severity, reliability, and mobility for all users? If such a rubric was utilized, please produce it for public review.

Department Response

DOT&PF acknowledges the request for a more transparent explanation of why the concept of Intermittent Passing Lanes / Three-Lane Highway was not advanced for detailed environmental analysis. The alternatives development process did not use a single weighted scoring rubric in which cost, Section 4(f), environmental effects, recreation access, multimodal access, construction disruption, planning consistency, safety, reliability, and mobility were assigned numeric weights for every concept. Instead, alternatives were first screened against the purpose and need of the project: reducing crash rates and severity, improving mobility and reliability, and safely accommodating mixed uses in the corridor. Alternatives that did not adequately meet those needs were not advanced for the same level of detailed environmental analysis as the Proposed Action.

Appendices D and E provide the technical basis for not advancing the three-lane concept. DOT&PF considered both an undivided three-lane concept and a divided three-lane concept. The undivided concept was not advanced because it would not physically separate opposing directions of travel, and separation of opposing traffic was identified as a necessary safety feature to address head-on and cross-centerline crash risk, particularly under winter loss-of-control conditions. The divided three-lane concept was then compared with the divided four-lane concept using traffic-safety and operational-performance measures.

That comparison showed that the three-lane divided concept would provide safety benefits compared with the No Action alternative, but would not provide the same safety and operational

performance throughout the corridor as the four-lane divided concept. The Draft Traffic and Safety Analysis predicted a 39% reduction in total crashes and a 42% reduction in fatality-and-injury crashes for the three-lane divided concept, compared with a 68% reduction in total crashes and a 68% reduction in fatality-and-injury crashes for the four-lane divided concept. Appendix G further shows that C2-M would reduce predicted roadway-segment crashes by 38% for total crashes and 39% for fatality-and-injury crashes, while C7/C7-T would reduce predicted roadway-segment crashes by 68% for total crashes and 69% for fatality-and-injury crashes.

The three-lane divided concept also did not satisfy the corridor mobility and reliability need to the same degree as the four-lane divided concept. Under design-year conditions, C2-M would operate at level of service (LOS) D/E or E in portions of the corridor, while C7/C7-T would operate at LOS A/B or B. Appendix G identifies C7 and C7-T as the only evaluated concepts meeting Association of State Highway and Transportation Officials' (AASHTO) target LOS B for a rural arterial. The three-lane concept would continue to rely on alternating passing-lane sections, leaving portions of the corridor with a single lane in one direction and continued susceptibility to platooning, driver frustration, and closure or reliability impacts if a crash, weather event, rockfall event, or other incident blocked the single lane direction.

DOT&PF also considered the mixed-use corridor function. The Seward Highway serves local residents, freight, emergency response, recreation, tourism, and through-travel between Anchorage, Girdwood, Whittier, and the Kenai Peninsula. The three-lane concept would provide some additional passing opportunities and could have a smaller footprint than a four-lane divided facility; however, it would not provide the same ability to separate through traffic from slower local, recreational, and sightseeing traffic; maintain corridor reliability; or reduce severe crash risk under projected conditions. For these reasons, DOT&PF determined that the three-lane concept did not meet the Project Purpose and Need to the degree necessary to be carried forward as a reasonable build alternative.

Because the three-lane concept was screened out based on Purpose and Need, it was not advanced to the same level of environmental-effects analysis as the Proposed Action. DOT&PF agrees that the Final EA should more clearly cross-reference the screening basis in Appendices D, E, and G and should clarify that the absence of a full cost, environmental-resource, Section 4(f), and construction-disruption table for the three-lane concept reflects its elimination at the Purpose-and-Need screening stage, not the omission of a completed weighted scoring rubric. The Final EA will revise Appendix D, as appropriate, to make the screening sequence and rationale more transparent.

1.4 Traffic Safety Analysis Methodology

Corresponds to AMATS PC Comment 4

Comment

Member Baldwin Day: Appendix G (Traffic & Safety Analysis) states that DOT&PF approved the future safety performance analysis methodology. Please explain why alternative C2-M was eliminated because it did not “sufficiently reduce crash rates and severity” compared to the four-lane divided highway option when the actual delta on fatal and serious injury crashes is less than one incident per year between C2-M and C7/7-T. Please further explain how alternative C7/7-T does more to prevent single-vehicle run-off-the-road crashes, which account for nearly 50% of all crash types and over 40% of FI crashes.

Department Response

DOT&PF acknowledges the request for additional explanation regarding the comparative safety performance of C2-M and C7/C7-T. C2-M was evaluated and was found to provide safety benefits compared with the No Action alternative; however, it did not provide the same corridor-wide safety or operational performance as the four-lane divided concepts. The distinction between C2-M and C7/C7-T is most apparent in the roadway-segment crash analysis. Appendix G shows that C2-M would reduce predicted roadway-segment crashes by 38 percent for total crashes and 39 percent for fatality-and-injury crashes. By comparison, C7/C7-T would reduce predicted roadway-segment crashes by 68 percent for total crashes and 69 percent for fatality-and-injury crashes. Therefore, although the annualized difference in fatal and serious injury crashes may appear small when expressed as incidents per year, the broader predictive analysis shows a material difference in corridor-wide crash reduction and safety performance.

DOT&PF also notes that the predictive safety analysis included limitations specific to C2-M. Appendix G explains that there is not a reliable, industry-accepted crash modification factor for installing a median or barrier on a two-lane rural highway. As a result, C2-M was evaluated using the available Highway Safety Manual and Crash Modification Factor Clearinghouse methodology, with additional consideration of crash types that would be affected by physical separation of opposing traffic. This limitation will be more clearly explained in the Final Traffic and Safety Analysis.

With respect to single-vehicle run-off-road crashes, DOT&PF does not assert that C7/C7-T would eliminate that crash type. Single-vehicle run-off-road crashes are a substantial existing crash pattern in the corridor, particularly during winter conditions. The four-lane divided concepts address this risk through a combination of design features, including curve correction, improved shoulders, increased clear-zone and recovery opportunities where practicable, improved sight distance, access management, roadside hardware upgrades, and additional space for snow storage and winter maintenance operations. Median separation is also relevant to run-off-road and winter loss-of-control crashes because it reduces the likelihood that a vehicle leaving its lane or crossing the centerline will enter opposing traffic and result in a head-on or opposite-direction

crash.

For these reasons, DOT&PF determined that C7/C7-T better satisfies the Project Purpose and Need by providing greater corridor-wide safety benefit, improved operational reliability, and more consistent performance under existing and projected traffic conditions. The Final EA will include an updated Traffic and Safety Analysis with additional explanation of the methodology, assumptions, crash modification factors, limitations, and comparative safety performance of C2-M and C7/C7-T.

Section 2

Responses to AMATS Staff Comments

The following responses address the comments submitted by AMATS staff during the public review period for the Draft EA for the Safer Seward Highway Project. To facilitate cross-reference with the original comment letter, the Department has retained the original comment numbering and organization.

Overall Comments

2.1 Winter Crash Analysis and Traffic Forecasting

Corresponds to AMATS Overall Comment 1

Comment

The EA reports that most crashes, and most severe crashes, occur during winter; but the project has been designed for summer traffic volumes and driving behaviors. Designing for those summer conditions therefore does not address the safety purpose of this project.

Department Response

The median-separated facility is effective at resolving both summer and winter crashes, in conjunction with other improvements such as rockfall mitigation. As documented in the safety analysis, physically separating the directions of traffic is the most effective way to reduce severe crashes on the Seward Highway.

During the course of project development, a design designation was completed. This resulted in a revised growth rate which was subsequently incorporated into the Proposed Action following publication of the Draft EA. The preliminary analysis, completed before a formal design designation, used a growth rate of 1.0% based on traffic volume data collected during the months of June through September. This was also consistent with previous projects in the corridor.

Following completion of the final design designation using year-round traffic volumes, a compound growth rate of 0.54% was established. The revised analysis continues to result in Levels of Service D and E within portions of the corridor.

Additionally, the time-percent-following and driver density analyses continue to exceed Highway Capacity Manual (HCM) thresholds for this roadway classification. These conditions contribute to high-risk passing maneuvers and other driver behaviors that increase crash potential. Updated directional split and truck percentages were also incorporated into the annual traffic analysis. The revised analysis continues to support the Proposed Action as the preferred alternative, with

an estimated 68% reduction in crashes through improved mobility, median separation, access management, and reduction of high-risk maneuvers.

2.2 Passing Opportunities and Corridor Safety

Corresponds to AMATS Overall Comment 2

Comment

The EA emphasizes that a key needed safety improvement is to add passing opportunities, thus reducing platooning and unsafe passing maneuvers. However, the Traffic and Safety Analysis does not provide information on the incidence, severity, or mitigation of crashes occurring during passing maneuvers. Considering the strong emphasis placed on passing opportunities as a foundational need of this project, this information is needed to justify the four-lane design.

Department Response

The primary purpose of the Proposed Action is to improve safety. This requires a comprehensive approach due to the complexity of the corridor. Through access management, median separation, separated facilities for non-motorized users, and rockfall mitigation, the Proposed Action addresses multiple contributing factors to crashes on this critical Interstate Highway.

The Traffic and Safety Analysis is one component of the overall evaluation supporting the Proposed Action. It evaluates observed crash patterns and driver behavior, which demonstrate that unsafe passing, sudden braking, and platooning contribute to unpredictable traffic conditions and increased crash risk, particularly within a corridor characterized by mixed users, variable speeds, and constrained geometry.

While the EA does not isolate passing maneuvers as a distinct crash category in every instance, it evaluates the traffic interactions that contribute to crash frequency and severity. Improvements to traffic flow consistency reduce the likelihood of unsafe maneuvers, even where those maneuvers cannot be directly attributed to a single crash category.

Providing additional passing opportunities is only one element of the Proposed Action. The preferred alternative addresses a combination of operational and safety deficiencies that together contribute to crash risk.

2.3 Project Limits and Corridor-Wide Safety Improvements

Corresponds to AMATS Overall Comment 3

Comment

Three of the four fatalities in the Project corridor occurred within a two-mile segment (MP 102–104). Please explain why the project includes the full 20-mile corridor rather than focusing on the highest crash location.

Department Response

DOT&PF recognizes that certain segments, including MP 102–104, have experienced a concentration of fatal crashes. However, the Project Purpose and Need statement is based on corridor-wide safety deficiencies rather than isolated crash locations.

Serious injury crashes occur throughout the Project corridor, and addressing only a limited segment would not resolve the recurring operational, geometric, and safety issues identified throughout the corridor. Drivers experience the Seward Highway as a continuous facility, and abrupt transitions between improved and unimproved roadway sections can create inconsistent driver expectations that contribute to crash risk.

The Seward Highway through Turnagain Arm is currently designated as a Traffic Safety Corridor. One objective of the Proposed Action is to reduce crash frequency and severity throughout the corridor to a level that no longer warrants that designation. Addressing only a limited segment would not achieve that outcome.

2.4 Highway Safety Improvement Program and Traffic Safety Corridor Designation

Corresponds to AMATS Overall Comment 4

Comment

While this has been framed as a safety project, this corridor ranks relatively low on DOT&PF's Highway Safety Improvement Program (HSIP) High Crash Location list, indicating that other corridors may represent a higher priority for safety projects and funding.

Department Response

The HSIP High Crash Location list serves a different purpose than Alaska's Traffic Safety Corridor Program.

A designated Traffic Safety Corridor is a segment of state highway identified as having a higher-than-average incidence of fatal and serious injury crashes where the Commissioners of Transportation & Public Facilities and Public Safety have agreed to coordinate engineering, education, enforcement, and emergency response efforts.

In 2006, this segment of the Seward Highway was designated as Alaska's first Traffic Safety Corridor. Despite enhanced enforcement, public education, improved signing, and targeted engineering improvements, significant crash severity concerns remain. The Safer Seward High-

way Project represents the long-term engineering solution intended to address these persistent corridor-wide safety issues.

2.5 Non-Motorized Connections

Corresponds to AMATS Overall Comment 5

Comment

Some non-motorized connections discussed during stakeholder meetings have been removed from the design.

Department Response

Noted. See the responses to the pathway-specific comments below.

2.6 Pullouts, Recreational Access, and Pathway Safety

Corresponds to AMATS Overall Comment 6

Comment

Removal of pullouts could increase parking on the shoulders and pathway, increasing safety issues and degrading the recreational and tourism value of the corridor.

Department Response

DOT&PF recognizes the importance of maintaining recreational access while improving safety. The Project consolidates numerous informal pullouts into fewer, larger, and safer access locations to reduce the turning conflicts that currently contribute to crashes.

The Project includes access management, signing, and improved designated parking areas intended to discourage unsafe stopping behavior.

With respect to barriers, physical separation between the roadway and pathway will continue to be refined during final design. The use of rigid barriers within or adjacent to the roadway clear zone can introduce additional hazards by reducing recovery space for errant vehicles and increasing crash severity. Accordingly, barrier use will continue to be evaluated based on site-specific safety analysis while balancing roadway safety, pathway user safety, environmental constraints, and maintenance considerations.

2.7 Replacement of Recreational Lands

Corresponds to AMATS Overall Comment 7

Comment

While the EA indicates that recreational land lost to this project will be replaced with land elsewhere, it is unclear whether that replacement will offer similar recreational opportunities.

Department Response

Replacement of park lands affected by the Project will occur in accordance with the Land and Water Conservation Fund Act. The replacement process relies upon appraised fair market value and reasonably equivalent usefulness and location rather than direct comparison of recreational amenities.

Replacement land and associated mitigation must satisfy statutory equivalency requirements, and the appropriateness of replacement property is determined through consultation with Chugach State Park, the Alaska Department of Natural Resources, and the National Park Service.

This information will be further described in the Final EA. Additional discussion of park mitigation is provided in Appendix S, Individual Section 4(f) Evaluation.

2.8 Long-Term Maintenance Responsibilities

Corresponds to AMATS Overall Comment 8

Comment

The proposed doubling of lane-miles and addition of the non-motorized pathway will increase long-term maintenance responsibilities. These impacts are not described in the EA.

Department Response

DOT&PF acknowledges that the Proposed Action would add maintained assets, including additional pavement surface, expanded shoulders, the separated multi-use pathway, drainage improvements, roadside safety hardware, pullouts, trailheads, and rockfall/icefall management areas.

However, added lane-miles alone do not determine long-term maintenance and operations cost. The existing corridor is an older, constrained highway that already requires pavement resurfacing, bridge and culvert maintenance, snow removal, street sweeping, brush clearing, roadside hardware maintenance, drainage maintenance, trash removal, rockfall/icefall response, traffic control, and other maintenance and operations activities. Reconstructing the corridor to current standards may reduce some reactive maintenance and operational burdens by replacing aging infrastructure, improving drainage, increasing snow storage, improving shoulders and recovery areas, and providing more room for maintenance equipment, incident response, and management of rockfall, icefall, avalanche, or crash-related closures.

The Final EA will be updated to include an estimated annual maintenance and operations discussion for the Proposed Action. That discussion will identify both added maintenance responsibilities and potential maintenance or operational efficiencies associated with a modernized divided facility.

2.9 Project Delivery Capacity and Statewide Funding

Corresponds to AMATS Overall Comment 9

Comment

Projects of this magnitude and cost have been rare in recent decades in Alaska, and it is unclear whether DOT&PF has the ability and capacity to deliver this project without affecting other transportation projects within Anchorage or elsewhere in the state.

Department Response

DOT&PF intends to construct this project in multiple phases over approximately 15 to 20 years in order to balance financial resources and construction impacts, consistent with how numerous major highway improvements have been delivered throughout Alaska. A recent example is the Sterling Highway MP 45–60 project, which has been advanced in stages to ensure balanced investment across the Department’s statewide transportation program.

This approach is also consistent with the phased improvements previously completed on the Seward Highway between 36th Avenue and O’Malley Road in Anchorage.

DOT&PF solicits and considers public input regarding transportation funding priorities through the STIP process. Funding prioritization is outside the scope of the National Environmental Policy Act environmental review process, and comments regarding statewide funding priorities are addressed through development of the STIP.

Technical Comments by EA Appendix

2.10 Marine Mammal Construction Impacts

Corresponds to AMATS Staff Comment 1

Comment

The EA states that construction impacts on marine mammals would be primarily short-term and minor, yet also indicates that blasting could occur once per day, year-round over the duration of construction. Please provide additional information explaining how these impacts are considered short-term and minor.

Department Response

The blasting would not occur once per day, year-round over the duration of the 15- to 20-year construction period. Rather, blasting activities would occur during a relatively small portion of the overall construction schedule. The Final EA will be updated to clarify this distinction.

2.11 Multi-Use Pathway Alignment

Corresponds to AMATS Staff Comment 2(a)

Comment

Placing the pathway on the land side wherever practicable would reduce or eliminate the need for fencing between the highway corridor and the railroad, improve scenic quality, and reduce potential safety, parking, and maintenance concerns. While some locations may warrant a waterside pathway, the land side should be the default alignment.

Department Response

Thank you for the feedback. Many of these design elements will continue to be evaluated during final design. At this stage, the EA commits to construction of a separated multi-use pathway; however, the final alignment, elevation, fencing, and other design details will be refined during subsequent design phases.

2.12 Multi-Use Pathway Access to Trailheads

Corresponds to AMATS Staff Comment 2(b)

Comment

Non-motorized access is not shown to Rainbow Trailhead, Falls Creek, or Indianhouse Mountain Trailhead. Appendix S also indicates that non-motorized access will not be provided to these locations. Access should also be maintained to the Potter Creek parking area. Without these connections, pedestrians and bicyclists may cross the highway at grade, undermining the project's safety objectives.

Department Response

DOT&PF recognizes that the Proposed Action would significantly improve non-motorized safety and connectivity through construction of a continuous separated multi-use pathway. Appendix G identifies that the proposed pathway would improve non-motorized conditions from existing Level of Traffic Stress 4 conditions to Level of Traffic Stress 1 conditions.

DOT&PF also recognizes that non-motorized safety in this corridor includes the interface with the Alaska Railroad. Existing recreational access patterns, pullouts, trailheads, and shoreline destinations can create pressure for informal crossings of the highway and railroad tracks. The Proposed Action is intended to reduce those conflicts by providing a continuous separated pathway and by incorporating grade-separated or safer crossing treatments where feasible, including locations such as Beluga Point, McHugh Creek, Indian Creek, and other recreation-access areas.

During final design, DOT&PF will continue to evaluate pathway connections, spur access, and safe crossings for trailheads and recreation areas, including Rainbow Trailhead, Falls Creek, Indianhouse Mountain Trailhead, Potter Creek, McHugh Creek, Beluga Point, Indian Creek, and other access points where feasible. Where direct pathway access or grade-separated crossing cannot be provided because of safety, topographic, railroad, environmental, right-of-way, or constructability constraints, the Final EA or subsequent design documentation will identify the constraint and describe the alternative access approach.

2.13 Potter Valley Road Pathway Crossing

Corresponds to AMATS Staff Comment 2(c)

Comment

There is a short but potentially hazardous gap in the proposed pathway at Potter Valley Road. A safe crossing and pathway connection should be provided to eliminate this gap.

Department Response

DOT&PF acknowledges the concern regarding the pathway connection at Potter Valley Road. The intent of the Proposed Action is to provide a continuous separated non-motorized facility and to avoid creating gaps that would encourage pedestrians or bicyclists to use the highway shoulder or make unsafe crossings.

The Potter Valley Road pathway connection and crossing treatment will be evaluated during final design based on sight distance, roadway geometry, grades, drainage, right-of-way, railroad constraints, environmental constraints, and user safety. DOT&PF will coordinate with the Municipality of Anchorage during final design and will document the selected crossing or connection treatment.

2.14 Pathway Protection from Unauthorized Parking

Corresponds to AMATS Staff Comment 2(d)

Comment

With pullouts being removed and the existing tendency for drivers to stop at unofficial pullouts or on the shoulder, there will be a strong tendency for drivers to park on the multi-use pathway unless physically prevented. A barrier, non-traversable slope, or ditch should be provided between the roadway and pathway to discourage parking and protect non-motorized users.

Department Response

DOT&PF recognizes the concern that informal stopping could occur outside designated areas, particularly within a corridor that experiences significant scenic and recreational use. The Proposed Action addresses this concern by consolidating access into fewer, well-designed pullouts and providing clear signing and roadway delineation to discourage unsafe or unauthorized stopping.

While barriers, ditches, or grade separation may be appropriate in certain locations, installation of rigid barriers must be balanced with roadway safety considerations. Guardrail and other fixed objects placed within or adjacent to the roadway clear zone can reduce recovery space for errant vehicles and increase crash severity. Accordingly, separation treatments will be selected based on site-specific engineering analysis.

The Project team will continue to evaluate a combination of separation strategies during final design to discourage vehicle encroachment onto the pathway while maintaining roadway safety and protecting non-motorized users.

2.15 Multi-Use Pathway Maintenance Considerations

Corresponds to AMATS Staff Comment 2(e)

Comment

Without sufficient separation between the roadway and pathway, gravel and snow will accumulate on the pathway, increasing maintenance requirements and potentially reducing usability. Frequent sweeping and snow removal may be required, particularly if maintenance responsibilities are shared with another agency.

Department Response

Thank you for your comment regarding maintenance and long-term usability of the multi-use pathway.

As noted, guardrail alone is not intended to function as a debris barrier, and DOT&PF agrees that pathway placement and separation treatments must consider both safety and long-term

maintenance. At the same time, separation features must be balanced with roadway safety requirements, including maintaining an appropriate clear zone free of rigid hazards for errant vehicles, which limits the use of certain barrier or ditch configurations adjacent to the roadway.

During final design, DOT&PF will work with partner agencies, as appropriate, to develop maintenance agreements that clarify long-term maintenance and operations responsibilities for the pathway, frontage roads, trailheads, and other roadside features. These agreements may involve coordination with the Municipality of Anchorage, Chugach State Park, and other local agencies or stakeholders.

2.16 Potter Marsh Access and User Experience

Corresponds to AMATS Staff Comment 2(f)

Comment

The proposed pathway along Potter Marsh will improve non-motorized access; however, limiting pullout access to the pathway may create concerns for tour operators, wildlife photographers, and birders. Additional separation between the roadway and pathway should be considered to improve the user experience.

Department Response

DOT&PF appreciates the comment regarding access at Potter Marsh and agrees that the proposed pathway will improve non-motorized access to the marsh and associated viewing areas.

However, the Potter Marsh area presents unique environmental constraints. The Project is designed to avoid and minimize impacts to wetlands and sensitive habitat, limiting opportunities to expand the project footprint through wider buffers, ditches, or additional fill. Consequently, the design seeks to minimize impacts to wetlands while balancing user safety, recreational access, and environmental stewardship.

DOT&PF recognizes the importance of maintaining a positive experience for all users and will continue evaluating pathway design, separation, and access opportunities during final design while protecting the sensitive Potter Marsh environment.

2.17 Maintaining Non-Motorized Access During Construction

Corresponds to AMATS Staff Comment 2(g)

Comment

The EA indicates that roadway and railroad traffic will be maintained during construction. Non-motorized travel should also be maintained throughout construction so that users of the existing pathway are not forced onto the highway shoulder.

Department Response

DOT&PF acknowledges this concern.

DOT&PF acknowledges this concern. The Final EA will be updated to clarify that non-motorized access will be maintained during construction to the extent practicable through continued use of existing facilities, temporary detours, staged construction, or other temporary traffic-control measures.

Construction-period access planning will be developed to avoid directing non-motorized users onto active highway shoulders or toward informal railroad crossings without appropriate separation, signing, traffic control, detour provisions, or coordination with the Alaska Railroad Corporation.

2.18 Scenic Byway Designation and Visual Character

Corresponds to AMATS Staff Comment 3

Comment

There appears to be a significant amount of blasting and other changes to the natural landscape, removal of recreational access points, and overall changes to the look and feel of the corridor. What will happen to the Scenic Byway designation at the completion of the project?

Department Response

The Scenic Byway designation would not automatically change as a result of construction of the Proposed Action. However, DOT&PF acknowledges that the Proposed Action would alter the visual character of portions of the corridor through widened pavement, divided-highway features, rock cuts, railroad realignment and fencing, pathway placement, pullout consolidation, and changes to views in areas such as Potter Marsh and Turnagain Arm.

Appendix N, Visual Impact Assessment, evaluates these issues by identifying the corridor's visual character, affected viewers, scenic viewpoints, viewsheds, landscape units, and visual simulations. The Final EA will more clearly rely on that analysis to explain the expected visual effects and the measures proposed to avoid, minimize, or mitigate adverse visual impacts where practicable.

The Proposed Action is intended to balance transportation safety, recreation access, scenic qual-

ity, environmental constraints, and constructability. Chugach State Park and surrounding lands would continue to provide recreational opportunities following project completion, and the Final EA will clarify how visual and recreational considerations have been incorporated into project design and mitigation.

2.19 Highway Median Width and Pathway Separation

Corresponds to AMATS Staff Comment 4

Comment

Why are wide medians proposed in portions of the project while relatively little separation is provided between the roadway and the multi-use pathway? The wider median appears to increase project impacts and cost without corresponding safety benefits, while the pathway remains within the roadway clear zone.

Department Response

The areas identified are not necessarily wide medians in the conventional sense. In several locations, the apparent separation between opposing roadways reflects the surrounding topography, elevation differences, rock cuts, and the need to fit the highway, railroad, pathway, drainage, and access improvements within the constrained corridor between the Chugach Mountains, the Alaska Railroad, Turnagain Arm, Potter Marsh, and Chugach State Park.

The Proposed Action includes several typical sections. In some locations, the four-lane median-divided section includes a depressed median; in other locations, the roadways are vertically separated to take advantage of natural benches and reduce rock-cut impacts; and in more constrained locations, a barrier-divided section may be used. Therefore, the width between opposing directions of travel is not solely a discretionary median width, but a function of terrain, grade separation, safety, constructability, rock-cut minimization, drainage, railroad constraints, and environmental constraints.

The multi-use pathway is also a safety feature of the Proposed Action. The EA identifies a separated, paved multi-use pathway, generally 10 feet wide with 2-foot shoulders, separated from the highway shoulder by a minimum of 10 feet. Where corridor space permits, the pathway may be located farther from the roadway or at a different elevation to improve user comfort, safety, and experience. Appendix G identifies that the pathway would improve non-motorized conditions from existing LTS 4 conditions to LTS 1 conditions.

DOT&PF agrees that pathway separation, pathway protection, and long-term maintenance are important design considerations. However, additional barriers, steep ditches, or other fixed objects adjacent to the roadway must be balanced against roadway clear-zone requirements and

the need to provide recovery space for errant vehicles. Separation treatments may include horizontal separation, vertical separation, grading, drainage features, fencing, delineation, barriers where warranted, or other site-specific measures developed during final design.

Environmental constraints also affect pathway separation. In areas such as Potter Marsh, expanding the project footprint solely to increase pathway separation could increase impacts to wetlands, habitat, park or refuge resources, railroad facilities, or Turnagain Arm. The proposed configuration therefore reflects a context-sensitive balance among roadway safety, pathway user safety, railroad operations, environmental stewardship, recreation access, constructability, maintenance, and cost. DOT&PF will continue to refine pathway separation and protection treatments during final design and will document site-specific constraints where preferred separation cannot be achieved.

2.20 Highway Safety Improvement Program and Safety Corridor Designation

Corresponds to AMATS Staff Comment 5

Comment

These segments of the Seward Highway are not identified as priorities in the 2025 Alaska Strategic Highway Safety Plan and rank relatively low on the Highway Safety Improvement Program High Crash Location list.

Department Response

The Seward Highway through Turnagain Arm was designated as a Traffic Safety Corridor in 2006.

A Traffic Safety Corridor differs from the HSIP High Crash Location list. Traffic Safety Corridors are designated based upon the frequency and severity of fatal and serious injury crashes and provide a coordinated approach involving engineering improvements, education, enforcement, and emergency response.

The Updated Traffic and Safety Analysis included with the Final EA provides additional discussion regarding the basis for the corridor designation and the engineering improvements proposed through the Safer Seward Highway Project.

2.21 Tolling Authority

Corresponds to AMATS Staff Comment 6(a)

Comment

Appendix D states that DOT&PF does not consider tolling on the Seward Highway to be a reasonable alternative because no legal mechanism exists to enact tolls. However, Alaska Statute 19.75 established the Knik Arm Bridge and Toll Authority (KABATA). Please explain why this authority was not considered.

Department Response

Thank you for providing the KABATA example. While the Legislature established the Knik Arm Bridge and Toll Authority under AS 19.75, that authority is limited to the Knik Arm Bridge project and does not authorize tolling on the Seward Highway. No comparable statutory authority currently exists for the Seward Highway.

There is currently no statutory authority authorizing tolling on the Seward Highway. In addition, DOT&PF does not consider tolling to be a reasonable alternative because it would not address the project's Purpose and Need and would not resolve the identified transportation safety and operational deficiencies.

2.22 Tolling and Equity Considerations

Corresponds to AMATS Staff Comment 6(b)

Comment

Did the Project team consider the KABATA legislation when stating there is no legal mechanism for tolling? Regarding equity, what demographic populations were evaluated? Is the Project team conflating equality with equity?

Department Response

Yes. The Project team considered the KABATA legislation. KABATA's authority under AS 19.75.111 is specific to the Knik Arm Bridge and associated facilities and does not provide authority for tolling the Seward Highway.

Appendix D considered tolling in the context of congestion pricing and transportation demand management. Tolling was not advanced as a reasonable alternative because it would not meet the Project Purpose and Need and would not resolve the identified safety, mobility, reliability, or mixed-use corridor deficiencies. Because tolling was screened out and not advanced as a reasonable alternative, the EA did not conduct a demographic analysis of populations that could be affected by a tolling alternative.

DOT&PF acknowledges the terminology concern raised in the comment. The Final EA will revise the tolling discussion to avoid unsupported use of the terms *equity* or *equality*. Instead, the discussion will focus on the relevant transportation considerations, including access, affordability,

user burden, and the fact that the Seward Highway is the only highway connection between Anchorage and communities to the south along Turnagain Arm and the Kenai Peninsula.

Questions regarding tolling implementation, financing, or independent legal authority are separate policy and legal matters outside the scope of the EA alternatives analysis.

2.23 Fatal Crash Data and Figure Consistency

Corresponds to AMATS Staff Comment 6(c)

Comment

Appendix G states that four fatal crashes occurred between 2017 and 2021; however, the accompanying figure identifies different years for those crashes. Please explain the discrepancy between the text and Figure 2-2.

Department Response

DOT&PF acknowledges the discrepancy between the Appendix G narrative text and Figure 2-2. The underlying crash records confirm that four fatal crash events occurred within the calendar-year study period 2017-2021. Figure 2-2 is consistent with the underlying crash records: one fatal crash occurred in 2018, one fatal crash occurred in 2019, and two fatal crashes occurred in 2020.

The discrepancy appears to be in the Appendix G narrative sentence stating that the fatal crashes occurred “two in 2018, one in 2019, and one in 2021.” Appendix G reports crashes by calendar crash year, not by federal or state fiscal year. Although the December 2020 fatal crash could fall within fiscal year 2021 under a fiscal year reporting convention, Appendix G does not use that convention for Figure 2-2 or the historical crash table. Therefore, the narrative sentence will be corrected to match the crash records and Figure 2-2.

The corrected fatal crash summary will state that the four fatal crash events were: a June 2018 head-on crash, a March 2019 angle/T-bone crash, a March 2020 head-on crash, and a December 2020 head-on crash. The Final EA and updated Appendix G will also reconcile related statements regarding fatal crash locations and crash types. The correction does not change the total number of fatal crash events in the 2017–2021 study period, but it will correct the year-by-year description and ensure that the narrative, figure, and underlying crash records are consistent.

DOT&PF also notes that additional fatal crashes have occurred in the project corridor after the 2017–2021 crash study period. These post-study-period crashes are not part of the historical dataset used in the Draft EA’s predictive crash analysis, but they are relevant to the ongoing safety context for the corridor. Reported post-study-period fatal crashes include the July 2023

fatal head-on crash near Mile 103, the July 2024 fatal crash near Mile 114, and the July 2026 fatal head-on crash near Mile 116.7. DOT&PF will review verified post-study-period fatal and serious-injury crash information for inclusion or discussion in the Final EA, as appropriate, while clearly distinguishing those later crashes from the 2017–2021 crash dataset used in Appendix G.

2.24 Winter Crash History and Traffic Forecasting

Corresponds to AMATS Staff Comment 6(d)

Comment

Appendix G states that 40% of crashes occurred during winter months and that the highest frequency of single-vehicle run-off-road crashes occurred between November and March. However, the traffic analysis uses seasonally adjusted summer traffic volumes to establish design year Average Annual Daily Traffic (AADT). Please explain why the analysis emphasizes summer traffic conditions when crash history indicates the greatest safety concerns occur during winter.

Department Response

The median-separated facility is effective at reducing both summer and winter crashes when combined with other improvements such as rockfall mitigation. As documented in the Traffic and Safety Analysis, physically separating opposing directions of traffic is the most effective engineering countermeasure for reducing severe crashes on the Seward Highway.

During project development, a formal design designation was completed that resulted in revisions to the traffic projections used for the Proposed Action. The preliminary analysis, completed prior to the formal design designation, utilized a 1% annual growth rate based on summer traffic volumes and was consistent with previous Seward Highway projects. Following completion of the design designation using year-round traffic data, the compound annual growth rate was revised to 0.54%.

The updated analysis continues to result in Level of Service D and E conditions in portions of the corridor. Time-percent-following and driver density values also continue to exceed Highway Capacity Manual thresholds for this roadway classification. These conditions contribute to unsafe passing maneuvers and other driver behaviors that increase crash risk. Directional traffic splits and truck percentages were likewise updated to reflect annual traffic conditions. The revised analysis continues to support the Proposed Action as the preferred alternative, with an estimated 68 percent reduction in crashes through median separation, improved mobility, access management, and reduced high-risk driving maneuvers.

2.25 Crash Severity Analysis

Corresponds to AMATS Staff Comment 6(e)

Comment

Appendix G and Appendix C should distinguish fatal and serious injury crashes from minor injury crashes rather than grouping all injury crashes together. Additional information describing the timing, conditions, and movements associated with fatal and serious injury crashes would also be beneficial.

Department Response

The Traffic and Safety Analysis will be updated to include additional information regarding fatal and serious injury crashes in response to public comments.

2.26 Operating Speed and Roadway Design

Corresponds to AMATS Staff Comment 6(f)

Comment

Although the posted speed limit would remain unchanged, widening the roadway, increasing the clear zone, and flattening curves may increase operating speeds. Please explain whether potential increases in operating speed were considered when evaluating project safety.

Department Response

DOT&PF recognizes that operating speed is an important factor affecting crash severity and considered this relationship during the safety evaluation.

The analysis does not assume that driver behavior remains unchanged. While roadway geometry can influence operating speeds, the Proposed Action focuses on reducing high-risk conflict points and improving sight distance, roadway consistency, and recovery opportunities that reduce the likelihood of severe crashes.

The Proposed Action maintains a 55-mile-per-hour design speed and posted speed consistent with existing conditions while incorporating median separation, access management, and consistent roadway geometry to reduce severe conflicts. The roadway has been designed in accordance with Section 1100 of the Highway Preconstruction Manual using design elements intended to encourage speed compliance.

FHWA and AASHTO guidance recognize that safety improves through consistent roadway design, adequate stopping sight distance, and appropriate access management, particularly when

opposing traffic is physically separated.

2.27 Future Alaska Railroad Double Track Accommodation

Corresponds to AMATS Staff Comment 6(g)

Comment

Appendix U states that the Alaska Railroad embankment would accommodate a possible future double track. Is a second track planned or is this only a hypothetical future consideration?

Department Response

The Alaska Railroad Corporation requested that the Proposed Action include sufficient embankment width to accommodate a potential future second track. This accommodation is included as a future-compatibility design feature and does not represent a DOT&PF determination that a second track is currently programmed.

The Proposed Action also includes railroad realignment or reconstruction where needed to accommodate the widened highway, curve corrections, pathway improvements, and constrained corridor geometry. Appendix Q identifies approximately seven miles of railroad alignment and track shifts within the Project corridor. Existing sidings and ARRC maintenance access points would be maintained, and railroad bridges, culverts, coastal armoring, and embankment sections would be replaced, extended, or upgraded as needed to meet current standards and preserve railroad function.

These railroad-related improvements are part of the overall corridor safety and constructability strategy. They help integrate highway, railroad, pathway, and recreational access needs within a corridor constrained by Turnagain Arm, the Chugach Mountains, existing communities, and protected park/refuge resources. Questions regarding future railroad expansion plans should be directed to the Alaska Railroad Corporation.

2.28 Section 6(f) Park Land Replacement

Corresponds to AMATS Staff Comment 6(h)

Comment

Please provide additional information regarding replacement lands required under Section 6(f). Equivalent monetary value does not necessarily provide equivalent recreational opportunities or accessibility.

Department Response

The referenced compensation is based on Section 6(f) of the Land and Water Conservation Fund Act, which applies when park land encumbered by Section 6(f) protections is converted to a non-recreational use.

Section 6(f) requires replacement property of at least equal fair market value and reasonably equivalent usefulness and location, subject to coordination with the managing agency and approval by the National Park Service. Accordingly, the value identified in the EA reflects the appraised fair market value of the affected Section 6(f) property rather than the total acreage affected by the Project.

Final valuation, replacement property selection, and approval will occur through the separate Section 6(f) conversion process administered by the National Park Service in accordance with 36 CFR 59.3. DOT&PF continues to coordinate with the Alaska Department of Natural Resources and the National Park Service. Additional information regarding this process will be included in the Final EA.

2.29 Long-Term Maintenance Funding

Corresponds to AMATS Staff Comment 7

Comment

There is concern that doubling the lane-miles and constructing a new multi-use pathway will substantially increase long-term maintenance costs. Will additional maintenance funding be provided? The State already faces a significant backlog of deferred maintenance on existing facilities.

Department Response

DOT&PF recognizes that the Proposed Action would add maintenance responsibilities for new or expanded assets, including additional pavement surface, shoulders, the separated multi-use pathway, drainage improvements, roadside safety hardware, pullouts, trailheads, and rock-fall/icefall management areas.

DOT&PF does not agree that the maintenance effect can be determined solely by comparing existing and future lane-miles. The existing facility is aging and constrained, and the No Action alternative would still require ongoing pavement resurfacing, bridge and culvert maintenance, snow removal, street sweeping, brush clearing, drainage work, roadside hardware repair, trash removal, and response to rockfall, icefall, avalanche, crashes, and closures. Reconstruction to current standards may reduce some maintenance and operations costs by replacing aging assets, improving drainage, increasing snow storage and shoulder area, reducing recurring reactive repairs, and providing more room for maintenance crews and emergency responders to

work without full closures.

The Final EA will include an estimated annual maintenance and operations discussion that identifies both the additional assets to be maintained and the operational efficiencies that may result from modernization. Long-term maintenance needs would be addressed through DOT&PF's annual maintenance and operations budgeting process and, where applicable, through future maintenance agreements or coordination with partner agencies or land managers. The Final EA will not make future budget appropriations, but it will disclose the expected maintenance categories and operational responsibilities associated with the Proposed Action.

2.30 Winter Maintenance Priorities

Corresponds to AMATS Staff Comment 8

Comment

Because the Seward Highway is already a high priority for winter maintenance, increasing the maintenance burden on this corridor could delay snow removal on other roadways with higher traffic volumes.

Department Response

The Proposed Action will increase maintenance responsibilities associated with the additional pavement surface; however, the divided highway configuration may also improve long-term maintenance efficiency by providing additional space for snow storage and maintenance operations.

DOT&PF prioritizes winter maintenance activities based on roadway classification, traffic volumes, and operational importance. The Project corridor would remain a Priority Level 1 facility under the Department's statewide winter maintenance program.

2.31 Potter Marsh Pullout Access

Corresponds to AMATS Staff Comment 9

Comment

At least one pullout should be retained at Potter Marsh to preserve access for birders, photographers, tour operators, and visitors with limited mobility. Eliminating vehicular access may increase shoulder parking and reduce recreational opportunities.

Department Response

DOT&PF recognizes that Potter Marsh is a unique and heavily used recreational resource and

has coordinated extensively with the Alaska Department of Fish and Game regarding access, habitat protection, and visitor experience.

The reduction and consolidation of pullouts are part of the corridor-wide access management strategy intended to reduce crash risk associated with turning movements, sudden stops, and pedestrians crossing the highway. While some direct vehicle access points would be modified, the Proposed Action provides alternative access through improved pullouts and the separated multi-use pathway.

DOT&PF understands concerns regarding informal shoulder parking and has incorporated designated access points and roadway features intended to discourage unsafe stopping. Suggestions such as retaining a right-in/right-out pullout have been considered; however, these decisions must balance sight distance, operating speeds, spacing between access points, and overall roadway safety.

The Department will continue coordinating with the Alaska Department of Fish and Game and other stakeholders during final design to ensure recreational access is balanced with transportation safety and resource protection.

2.32 Consistency with State Planning Documents

Corresponds to AMATS Staff Comment 10

Comment

The EA does not clearly demonstrate consistency with the Seward Highway Corridor Partnership Plan or the Chugach State Park Management Plan, both of which emphasize preserving scenic character while improving safety and access.

Department Response

The Visual Impact Assessment will be updated to provide additional discussion regarding the Proposed Action's consistency with both the Seward Highway Corridor Partnership Plan and the Chugach State Park Management Plan. The Final EA will incorporate these revisions to more clearly explain how the Proposed Action balances transportation safety, recreation, scenic quality, and environmental stewardship.

2.33 Visitor Experience and Visual Impact Assessment

Corresponds to AMATS Staff Comment 11

Comment

Appendix N states that visitors are less likely to experience visual impacts because they are less familiar with the corridor prior to construction. This appears to be a philosophical assertion, as visual impacts would occur regardless of a visitor's familiarity with the landscape.

Department Response

DOT&PF acknowledges the comment. The Final EA and Appendix N will revise the discussion so visual impacts are not dismissed or minimized based solely on whether a viewer is familiar with pre-construction corridor conditions. Visual impacts will be addressed using the relevant visual-analysis factors, including affected viewer groups, viewer sensitivity, viewing duration, scenic viewpoints, landscape units, viewshed, and the degree of visual change associated with the Proposed Action.

DOT&PF also recognizes visitor visual experience includes more than the appearance of the roadway. Under existing conditions, visitors often view scenery and wildlife from constrained pullouts, shoulders, or roadside areas immediately adjacent to high-speed traffic. These conditions can affect the quality and safety of the viewing experience, particularly at popular locations for beluga viewing, Dall sheep and mountain goat viewing, photography, and scenic observation.

The Proposed Action may result in beneficial visitor-experience effects in some locations by replacing or consolidating informal shoulder stopping areas with more organized access, improved pedestrian facilities, a separated multi-use pathway, and safer connections to scenic and recreational destinations. These improvements may reduce conflicts between visitors, parked vehicles, highway traffic, and railroad facilities while providing safer opportunities for viewing Turnagain Arm, wildlife, and the Chugach Mountains.

DOT&PF also acknowledges that visual quality is partly subjective and that some viewers may perceive widened pavement, rock cuts, pathway placement, rail fencing, pullout changes, or other constructed features as adverse visual changes. The Final EA and Appendix N will evaluate these considerations as objectively as practicable using the visual-impact methodology, visual simulations, viewer sensitivity, affected viewpoints, and proposed avoidance, minimization, and mitigation measures.

Conclusion

DOT&PF appreciates the time and effort invested by the AMATS PC and staff in reviewing the Draft EA. Public and agency comments have informed revisions to the environmental document and supporting technical analyses and have helped improve the clarity of the Final EA. The Department remains committed to continuing coordination with AMATS, the Municipality of Anchorage, cooperating agencies, and the public as the environmental review process moves toward completion.