

February 12th, 2026

Dear Safer Seward Project Team,

A comment period was announced starting on December 29th, 2025 and going through February 27th, 2026 for the Draft Environmental Assessment for the Safer Seward Highway project. AMATS staff are providing comments below.

Overall comments:

- 1) 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.
- 2) The EA emphasizes that a key needed safety improvement is to add passing opportunities, thus reducing platooning and unsafe passing maneuvers (e.g., Project Need 1). However, the Traffic and Safety Analysis does not provide any information on the incidence, severity, or options for mitigating crashes during passing maneuvers. The predicted improvement in passing crashes is also not provided for the Proposed Action. Considering the strong emphasis placed on passing opportunities as a foundational need of this project, this information is needed to justify the 4-lane design, which appears to be supported largely due to the increase in passing opportunities.
- 3) Three of the four fatalities in the project corridor occurred within a 2-mile segment (MP 102-104). Please also provide the locations of the serious-injury crashes and explain why this safety project needs to include the full 20-mile corridor rather than focusing on the most deadly 2 miles. (Page 23 of Appendix G lists crashes by segment, but only all crashes pooled, not by severity.)
- 4) While this has been framed as a safety project, this corridor ranks low on DOT&PF's Highway Safety Improvement in the [High Crash Location list](#) provided to AMATS during the work session in 2025 (55th and lower), indicating that other corridors

would be a higher priority for safety projects and funding (see below for further analysis and detail).

- 5) Some non-motorized connections that were discussed as part of the stakeholder meetings have been removed from the design (pathway access to three trailheads; detailed further below).
- 6) Removal of pullouts could increase parking on the shoulders and pathway, increasing safety issues, and would degrade the recreational and tourism value of the corridor. A physical barrier or non-traversable buffer between the pathway and highway will be needed to prevent this, and access to some pullouts should be retained (detailed further below).
- 7) 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 (rock climbing, easily accessible scenic views, trails).
- 8) The proposed doubling of lane-miles and addition of the non-motorized pathway will add a substantial maintenance burden, presumably with consequences for overall maintenance of DOT&PF roads in the AMATS area, but these consequences are not described in the EA.
- 9) 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 impacting other projects in the region and State.

Specific Comments:

- 1) Draft EA - 3.2.5.2 Environmental Consequences
“Construction Impacts – Impacts from Proposed Action construction on marine mammals would be primarily short term and minor, and couple include acoustic and non-acoustic stressors associated with construction. Up to 105 acres of fill would be places into the marine waters of Turnagain Arm, and blasting could occur once per day, year-round over the duration of the Proposed Action construction.” – In this section and others throughout the document it states that impacts will be primarily short term, but then goes on to say blasting could occur once per day,

year-round over the duration of the construction (15-20 years). Please provide more information on this is considered “*short term and minor*”.

2) Multiuse pathway:

- a. Putting the pathway on the land side wherever possible would reduce/eliminate the need for a fence between the highway corridor and the railroad, which would be beneficial for the scenic value to all users. Elevating the pathway above the highway on the land side would also mitigate safety concerns, illegal parking, and maintenance challenges. In some locations, it may still make sense to put the pathway on the waterside for efficient access to attractions, but consider making the land side the default rather than water side as shown.
- b. Non-motorized access is not shown to Rainbow Trailhead, Falls Creek, or Indianhouse Mountain Trailhead in Appendix F (Proposed Action Mapbook). The text of Appendix S (4f evaluation) also explicitly indicates that non-motorized access will **not** be provided to these locations (only to the Rainbow Point Scenic Overlook, which is on the opposite side of the highway from Rainbow Trailhead). Access from the pathway to all of these locations needs to be provided. Similarly, ensure the trail has a spur to the Potter Creek parking lot (it is currently not clear whether there will be access given the slope). These access routes will serve people biking to trailheads, people biking through but wanting a break, and people who drive but want to park and walk or bike the pathway. Without trail access, people will be walking across the highway at grade in dangerous areas, which would undermine the safety purpose & need of this project. On some segments, access may be most efficient if the pathway is built on the inland side of the highway instead of waterside as currently shown.
- c. There is a short but potentially dangerous gap in the planned pathway at Potter Valley Rd from where it comes in at the south and then continues to the north. This needs a safe crossing (with good visibility to drivers turning off the highway) and also a pathway continuation along the parking area to close the gap.

- d. With pullouts being removed and the existing tendency for drivers to stop at unofficial pullouts or on the shoulder, even where pullouts are currently available, there will be a strong tendency for drivers to park on the bike path unless that is prevented. It will be essential to include a physical barrier (guard rail or non-traversable slope or ditch) between the pathway and the road. Parking on the pathway would endanger non-motorized users and potentially block their mobility through the corridor. It would also reintroduce conflicts at unpredictable locations between motorized through-traffic and turning/stopping traffic, undermining the project's goal of reducing risks from those conflicts. Given the strong recreational and scenic attractions in this corridor, physically preventing parking on the pathway will be necessary to ensure compliance.
- e. A lack of barrier or wide buffer between the highway and pathway will also result in gravel and snow accumulating on the path, which will increase the maintenance burden. It could also render the path unmaintainable, depending on equipment availability, if there is a maintenance agreement with another agency (e.g., whether the agency has a sidewalk sweeper). This has been the case on the new pathway at Portage. The best way to prevent this is with a wide ditch between the two or with the path at a higher elevation than the road. Guard rail is completely ineffective as is evident at Portage, downward slopes are ineffective unless quite wide, and solid barriers will still have snow (with gravel) pushed over the top. When gravel covers the path such as at Portage, some bicyclists will opt to bike on the highway instead, and this will be less predictable for drivers, thus negating the safety benefit of this project. If a barrier or buffer is used that will not prevent gravel accumulation, frequent sweeping and plowing will be needed.
- f. The pathway along Potter Marsh, with access to the pullouts, will be a net benefit for people wanting to enjoy the marsh. However, the pullouts being accessible only from the path is likely to generate strong pushback from tour companies, wildlife photographers, and birders. The pathway will need to be appealing to be seen as a net benefit over parking areas, thus providing further justification to set it at least 20' from the highway shoulder as well as to provide a physical barrier or wide and deep ditch.

- g. The EA mentions that “road and rail traffic will be maintained during construction.” Also ensure that non-motorized mobility will be maintained, including where the existing pathway will be realigned due to highway construction. Otherwise, users of the existing path will be forced onto the highway shoulder, which will reduce safety.
- 3) 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 look and feel of the roadway and the surrounding area. What will happen with the scenic byway designation at the completion of the project?
- 4) Why is there such a significant space for the median in parts of the highway at all? This increases the impacts and cost of the project with no additional apparent benefit above a barrier. In contrast, why is more space not allocated to separate the pathway from the roadway? As it stands, the pathway is in the clear zone of the roadway, introducing a safety risk for the pathway users.
- 5) These segments of the Seward Highway are not on the 2025 Alaska Strategic Highway Safety Plan (SHSP) and don’t appear until spot 55 on the Highway Safety Improvement Program (HSIP) High Crash Location list provided to AMATS in 2025, [High Crash Location list](#). This corridor also ranks very low compared to corridors on the [AMATS High-Crash Network](#).
- 6) Appendices:
 - a. Appendix D – *“DOT&PF does not consider instituting tolling on the Seward Highway a reasonable alternative, as no legal mechanism exists for DOT&PF to enact tolls, and there would be serious concerns about equity and access for Alaskans who wish to travel on the only highway connecting to Girdwood, Whittier, and the Kenai Peninsula.”* - There has been authority established that could be used as an example case on how to move forward - **2025 Alaska Statutes Title 19. Highways and Ferries Chapter 75. Knik Arm Bridge and Toll Authority Article 1. Establishment and Organization. Sec. 19.75.021. Establishment of authority Universal Citation: AK Stat § 19.75.021 (2025).** Did the project team consider this when asserting there is no legal mechanism for tolls? Regarding equity, what did the project team use to determine the impacts for equity? What demographic populations

were used for the analysis? Is the project team conflating equality with equity?

- b. Appendix G page 14 of the document states there have been four crashes that resulted in fatalities from 2017-2021 and lists two in 2018, one in 2019, and one in 2021. The associated figure 2-2 shows the dates and only one in 2018, one in 2019, and two in 2020. Can more information be provided on why the text and the figure don't match for the years?
- c. Appendix G states that "40 percent of the crashes within the Project corridor occurred during winter months (December, January, February)", "The months of November through March recorded 70 percent of the SVROR crashes," and that "The fourth highest month for crash frequency was July, with 11 percent of the crashes" meaning that winter time has the highest safety concerns. Given that information the project team decided to seasonally adjust the AADT to reflect the summer months increase which ignores the fact that the winter time has lower AADT yet more crashes. It appears the project team is overinflating the AADT which would show a worse LOS for existing capacity, a better LOS for the 4-lane capacity, overinflate all the other metrics that use AADT, and provide more support for the need for a 4-lane facility without accurately reflecting the regular use of the roadway year round. This also directly impacts the design year AADT which is overinflated. If you used the current AADT as shown in table 3-3 and had a 1% growth factor most segments of the roadway would look similar to the 2024 inflated numbers and reduce the need for the 4-lane facility.
- d. The project design further caters to summer conditions by emphasizing the need to prevent queueing behind slow vehicles. In winter, slow vehicles such as RVs are much less common and there is also lower traffic volume in general, allowing more passing opportunities. The EA does not provide evidence that designing for summer driving behaviors (passing) will improve safety in winter, when the crash history is worst.
- e. Appendix G (and the summary of it in Appendix C) should show the breakdown of fatal + serious injuries versus minor injuries instead of lumping minor injuries with fatal/serious crashes. "Small cuts and bruises" are a

completely different safety consideration from fatalities or serious injuries. While there is not a large enough sample size (12 fatal/serious) for a statistical analysis, it would still be informative to show when these crashes occur across months, weather conditions, etc, including showing the breakdown in the figures and tables. It would also be helpful to describe the movements (the text says only that 3 fatal and 2 serious-injury crashes were head-on, not what the other serious crashes were).

- f. Despite maintaining the posted speed limit, remaining crashes of any type will be more severe if operating speed increases. The widened road, widened clear zone, and straightened curves are likely to increase operating speeds. Was that increase considered when evaluating safety outcomes?
 - g. Appendix U – Sec 3.1.2 *“The ARRC embankment would also be wider as it would accommodate a possible future double track.”* – Are there plans for a double track? Or is this hypothetical?
 - h. Appendix U – Sec 6.2 Park and Recreation *“The new highway alignment would result in the conversion of 162.7 acres of CSP to transportation uses. Replacement lands of similar recreation value would be provided in compliance with Section 6(f) requirements. The impacts of the Proposed Action on parks and recreation resources, taken together with past and reasonably foreseeable future actions, would not substantially change the environment because CSP and surrounding lands along the Project corridor would continue to offer opportunities for the enjoyment of and recreation within CSP, and improvements from the Proposed Action and other projects would continue to occur.”* - Please provide more information about the lands of similar recreation value that would be provided. Will this land be similarly accessible? An equivalent or greater assessed value (monetary) does not mean the recreational opportunities will be similar.
- 7) There is a concern with an increase in more pavement (double the lane-miles and a new non-motorized pathway) will result in an increased costs for Maintenance. Will there be an increase in maintenance funding provided? This isn't just limited to winter maintenance, there will be an increase in the pavement maintenance that

will need to be accounted for, and the State of Alaska already has an overabundance of deferred maintenance for other roads.

- 8) With Seward Highway being a top priority for winter maintenance, a higher maintenance burden there means it will take longer to get done, and other roads with more users will take longer to get done in a timely fashion.
- 9) At least one pullout should be retained at Potter Marsh in the best birding spot. Make it right-in, right-out only. Otherwise people will park on the shoulders, potentially on both sides, introducing dangerous conflicts with slowing/turning/merging traffic as well as people walking across the highway. Removing vehicular access to these pullouts, as well as removal of many other pullouts throughout the corridor, will reduce recreational opportunities for people with limited time or mobility, thus not supporting Project Need 3 to “maintain the corridor’s scenic qualities while safely accommodating the needs of all users, including recreators and tourists accessing attractions.”
- 10) Appendix N – Two State plans are referenced in this section, The Seward Highway Corridor Partnership Plan (CPP) and the Chugach State Park Management Plan. *“The (CPP) provides three management strategies to guide Seward Highway development - (1) protect the existing aesthetics of the corridor while providing a safe driving environment; (2) responsibly manage the growing tourism industry without causing negative long-term impacts on the highway; and (3) encourage only sustainable, well-planned development that supports the tranquil, scenic character of the roadway.”* Likewise, the Chugach State Park Management Plan states, *“As it pertains to visual resources, the management intent for the Turnagain Arm Planning Unit is to preserve scenic sites along the transportation corridor as well as ensure corridor development creates access, recreation, enjoyment, and safety opportunities. This intent includes protecting Turnagain Arm’s historic, archaeological, and natural values. Special management considerations note that motorists often only experience CSP visually as they travel the Seward Highway; as such, any changes to the highway corridor should only improve and harmonize with the existing visual experience.”* - The information provided in the EA and appendices do not indicate that these strategies are being followed or upheld with the proposed work for this project.



- 11) Appendix N, page 18 – *“Visitors to the area are less likely to be impacted because they would be less familiar with the area prior to the Proposed Action being constructed.”* – This seems to be more of a philosophical assertion, it is true visitors will be less familiar with the area; however the impact on the land and views will be the same regardless of who has seen them before.

Thank you for the opportunity to review and provide comments. If you have any questions please let me know.

Sincerely,

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