RABBIT CREEK COMMUNITY COUNCIL (RCCC)
A Forum for Respectful Communication & Community Relations
1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503

To: Safer Seward Highway Team

From: Rabbit Creek Community Council

Date: February 12, 2026

RE: Comments on Safer Seward Highway Draft EA

There is broad support for improving safety on the Seward Highway corridor. However, the Draft Environmental Assessment (EA) for the "Safer" Seward Highway project does not establish that the proposed four-lane, vertically divided highway is necessary, proportional, or effective as a safety intervention. The EA's safety narrative is undermined by poor data quality, deficient modeling, and unrealistic assumptions about driver behavior, especially regarding speed. The EA also fails to match the scale of the proposed reconstruction to the most common crash causes and patterns.

At the same time, DOTPF repeatedly asserts that the four-lane divided design would produce no significant impacts to Chugach State Park (CSP), the Anchorage Coastal Wildlife Refuge (ACWR), and Turnagain Arm recreation and scenic resources. That conclusion is not credible given the project's stated footprint and long-term consequences for noise, access, trail character, wildlife viewing, and scenic and recreation values.

Because DOTPF did not robustly analyze smaller alternatives, it has not shown that impacts have been avoided or minimized to the greatest extent feasible. A credible alternatives analysis is the only way DOTPF can demonstrate minimization and avoidance and allow the public to evaluate the real tradeoffs.

DOTPF should therefore correct its data and modeling and produce a new public review draft (or amended EA) with detailed presentation of: (1) an upgraded two-lane alternative, (2) a three-lane "2+1" alternative, and (3) the most compact barrier-divided four-lane alternative. DOTPF must evaluate each alternative with both physical and operational safety elements and present results in clear charts using numbers, not percentages. If this can be done within an amended EA, release it for a 60-day public review. If an EA does not allow robust alternatives analysis, then DOTPF should prepare an EIS. Information in the EA clearly documents that the proposed project will significantly impact the human environment which is the threshold for completing an EIS rather than an EA.

1) Why the EA's Safety Conclusions Are Not Trustworthy

A. Poor data and deficient modeling undermine the safety case

The EA relies on traffic and safety modeling to justify a massive reconstruction, yet it does not provide the transparency and validation needed for the public to trust the outputs. The EA prioritizes driver convenience metrics (Level of Service (LOS), passing opportunity, low

follower density) rather than a direct safety question: which design prevents the most common crashes in this corridor under the conditions when crashes actually occur?

The crash dataset is also limited relative to a 25-year project design life, making it difficult to support fine distinctions between alternatives. The EA further obscures the meaning of safety outcomes by emphasizing percent reductions rather than presenting clear absolute numbers for crash types, serious injuries, and fatalities.

B. The EA misrepresents driving behavior—especially speed

A fundamental flaw is the EA's lack of a credible analysis of speed behavior on a wider, straighter, divided highway. A design with broad clear zones, wide shoulders, long sightlines, and frequent passing is likely to increase operating speeds and reduce "edge friction," creating greater risk of severe crashes. Yet the EA does not present a robust, corridor-specific assessment of current operating speeds on already-upgraded highway segments as a basis for predicting speeds on the proposed facility.

The EA therefore asks the public to accept the assumption that increasing passing opportunity (to near-constant availability) will improve safety, without demonstrating that the resulting real-world driver behavior will not worsen safety outcomes.

C. The EA fails to match the design to the most common crash causes

The EA's own crash characterization indicates many crashes occur in winter conditions, and a large share are single-vehicle run-off-the-road events. Yet the project justification focuses heavily on summer peak traffic, platooning, and LOS-based concerns. A safety-driven EA should prioritize the treatments most aligned with observed crash patterns—winter-focused measures, speed management, run-off-the-road prevention, and targeted upgrades—before concluding that only a four-lane divided highway is effective.

2) DOTPF's "No Significant Impacts" Conclusion Is Not Credible

DOTPF repeatedly concludes the proposed action would not substantially change the visual or recreation environment because a highway and railroad already exist. This "degraded baseline" reasoning is not a substitute for evaluating the magnitude and permanence of new impacts.

The project footprint described in the EA—major rock cuts, significant widening, access changes, and long-term noise effects—supports a foreseeable negative transformation of a National and Alaska Scenic Byway and recreation values along Turnagain Arm. These include impacts to the Turnagain Arm Trail experience, loss or consolidation of traditional pull-outs and access points, degraded wildlife viewing opportunities, and increased noise in sensitive refuge-adjacent areas. DOTPF should not dismiss these impacts as insignificant without clear, segment-level depictions and realistic assumptions about speed and truck traffic.

3) Smaller Alternatives Must Be Analyzed to Demonstrate Minimization and Avoidance

Analyzing smaller alternatives is the only way for DOTPF to demonstrate it has minimized impacts or avoided significant impacts. If DOTPF does not analyze options with substantially smaller footprints—especially those that could still achieve meaningful safety improvements—

then it cannot credibly claim there is no prudent and feasible alternative with less harm, nor that it has done "all possible planning to minimize harm."

A credible alternatives analysis must not screen out options primarily because they do not maximize passing opportunity or optimize LOS. It must compare alternatives based on real safety performance, realistic speed outcomes, intersection function, and total footprint and resource impacts, as well as cost.

4) What DOTPF Should Do Next

A. Revise the Purpose and Need statement and accompanying narrative. Add to the purpose: protect the scenic and recreational integrity of the corridor. Delete from the statement of need: elimination of platooning vehicles and priority for low percent following and lane density. Add to the statement of need: context sensitive design.

A. Produce a new public review draft (or amended EA or EIS) with a robust alternatives analysis that includes comparable analysis of:

1. An upgraded two-lane alternative
2. A three-lane "2+1" alternative with alternating passing zones
3. The most compact barrier-divided four-lane alternative (not a vertically divided design with the widest footprint)

For each alternative, DOTPF must evaluate the full range of feasible safety measures, including operational strategies, not just physical reconstruction. We appreciate that DOTPF is already implementing several "Safety Express Projects" along the highway that have been identified through the EA process.

B. Include operational and speed-management safety elements

DOTPF should explicitly analyze:

- Variable speed limits (already in the funding pipeline in 2026)
- Speed read-out signs
- Increased enforcement strategies
- Potential speed ticketing via camera (where legally feasible and appropriate)
- Increased maintenance strategies, particularly for winter conditions

C. Present comparisons in clear charts using numbers, not percentages

DOTPF should present side-by-side charts showing:

- Absolute safety outcomes (crash types addressed; serious injuries; fatalities)

- Travel time differences (in minutes/seconds)
- The lane density/follower density for all alternatives should not be a selection criterion.
- Intersection function and turning delays/queueing
- Construction-phase impacts on safety and mobility

D. Compare visual, noise, recreation, wildlife, CSP, and ACWR impacts across alternatives

DOTPF should directly compare the alternatives' impacts on visual quality, noise levels under realistic operating speeds, recreation access and trail character (including closure duration and reroute feasibility), wildlife habitat connectivity, and wetlands/tidelands impacts. This includes presenting comparative impacts to CSP and ACWR for each alternative in order to justify they have met the Section 4(f) of USDOT Act (49 USC 303) requirement to avoid and minimize impacts to public park lands and refuges.

E. Reissue for public review or proceed to an EIS

If DOTPF can incorporate this level of alternatives analysis into an amended EA, it should release the amended EA for a 60-day public review. If the EA framework does not allow robust alternatives analysis, DOTPF should proceed to an EIS.

Closing

The public wants a safer Seward Highway, but safety cannot be established through modeling that does not reflect real driving behavior—especially speed—and by dismissing smaller-footprint alternatives using LOS-based criteria that are not tied to crash causation. DOTPF should correct its data and modeling, evaluate smaller and compact alternatives on an equal footing, and provide transparent, numerical comparisons of safety and resource impacts so agencies and the public can assess what is truly necessary and what can be avoided.

Sincerely,

Tim Alderson, Chair
Rabbit Creek Community Council

cc: AMATS Policy Committee
Assembly members
Legislative representatives