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To: AWW SDEIS Comments
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Subject: 2010 SDEIS Comments EIS in inadequate

I-135-001

The October 2010 Supplemental EIS continues to avoid all of the important issues associated with this project.

Since the first EIS was prepared and the tunnel option was first presented, the EIS documents have distorted, misrepresented and failed to adequately present and analyze the elevated viaduct replacement option.

The first EIS (the nouveau "coffee table" look) first visually presented the replacement option as a grotesquely oversized structure that would dwarf the waterfront in a bad Photoshop presentation that so skewed the scale of the project that it seemed more like a fake postcard sold in tourist shops or on the cover of a sleazy tabloid.

Discussions of the tunnel option have failed to make it clear that a considerable portion of "superstructure" will still remain, mainly the large structure in front of the Pike Place Market. This is the part of the elevated structure that most people don't like and it will still be remain. The tunnel portion starts south of the Pike Place Market. The tunnel will also be noisier in the vicinity of the tunnel because of the grade going up and down to the tunnel. Many people think that the viaduct limits access between the core downtown and the waterfront. In fact this access is limited by steep natural topography between 1st Avenue and Alaskan Way, not by the elevated tunnel. Nor will it be remedied by a tunnel.

For some absurd reason, the replacement option is always shown with visual "blindings" across the water side of the elevated viaduct that would totally block the view of anyone driving on the Viaduct. Perhaps this is misleading presented as a noise reduction measure (as if that would really be necessary or helpful in mitigating noise).

I-135-002

The EIS has never recognized that the view from existing elevated Viaduct structure should be considered of national significance under NEPA/FHWA rules and should be preserved as a national treasure. The view of the cityscape from the elevated viaduct is the only view that most people ever really get of Puget Sound and the Olympics on a regular basis. The viaduct truly provides the "people's view"--affordable to almost anyone. Given the dearth of public viewpoints along the waterfront (all Port public access on the waterfront are essentially closed off during cruise ship season following 9/11 restrictions), it is a travesty that the public is losing this view. An elevated viaduct structure could be designed and made of materials to reduce noise and vibrations; the visual impact could be lessened by design and good lines; and the access under the elevated structure could be vastly improved at the time of new construction. This perspective has not been evaluated.

I-135-003

The tunnel option has been touted as superior because - it is claimed- that traffic will continue to use the elevated structure during tunnel construction. This is misleading given the extensive disruption of underground utilities required before the tunnel can be built (which would mostly be avoided with a replacement option) together with the fact that demolition still must occur. More important, the EIS has failed to investigate and present options that take advantage of the readily available technology and practices whereby major portions of the viaduct could be constructed onsite and rapidly transported and placed in large (pre-constructed segments) within a much compressed timetable. Certainly construction and transportation techniques used in construction of the Hood Canal bridge and the other floating bridge provides excellent departure point for construction logistics..

I-135-001

Environmental documentation for the project has been prepared in compliance with the National Environmental Policy Act (NEPA)(42 U.S.C. 4322(2)(c)) and the State Environmental Policy Act (SEPA)(Ch. 43.21 C RCW). The Final EIS Chapter 1, Introduction, includes the Purpose and Need and Chapter 2, Alternatives Development, describes the history of the project and alternatives development process. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives. Appendix F, Noise Discipline Report, explains the noise levels modeled for the Bored Tunnel Alternative and the change compared to existing conditions. Visual effects are explained in Appendix D, Visual Quality Discipline Report. Please refer to the Final EIS for current information.

I-135-002

The scenic views from the existing viaduct were acknowledged in the 2010 Supplemental Draft EIS in Chapter 4, Question 13, and are acknowledged in the Final EIS in Chapter 4. An Elevated Structure is considered in the Final EIS. Though the existing viaduct provides positive views for drivers, the structure itself affects the overall look of the area and contributes to what many consider to be negative views for those on the ground near the structure, for instance.

The visual quality effects of an Elevated Structure Alternative are fully discussed in the Final EIS Appendix D, Visual Quality Discipline Report.

I-135-004

However the major deficiency of the EIS and project proposal is the tremendous relative cost of the tunnel option in comparison to the cost of the replacement option. This cost has become even more ludicrous as the federal, state and local economy falters and the extent of neglect of Seattle's infrastructure city wide under Nickels' terms becomes evident. The condition of sewers, storm drains, the electric grid and roadways throughout Seattle are third world in many areas of the city and well past the engineered lifespan and they too need attention. Why so much money in one small area. The potholes in this city are not only a disgrace they are a menace. It is also a disgrace that the tunnel capacity fails to address growth projections. Good grief!

The Seattle Tunnel Project has been qualified for all sorts of federal and state funding in part because it has been expanded to incorporate the solution for a crumbling seawall and need for a new ferry terminal and thus qualifying the project for more federal and state funding. However, there is no reason that seawall construction and ferry terminal rebuild can't also be provided as part of a viaduct replacement.

The EIS has simply failed as a tool to help evaluate this project and intent and purpose of SEPA has not been met.

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This report discusses the permanent (operational) effects of the views along the waterfront as well as the effects on views from downtown toward the waterfront for all the build alternatives.

I-135-003

All of the build alternatives would have underground utility relocations as described in Chapter 6, Construction Effects, of the Final EIS. The Elevated Structure Alternative is expected to result in fewer effects on underground utilities than either tunnel alternative because there would be less below-grade work required.

The project has investigated constructing segments off-site and floating them in. However, the tidal fluctuations in Elliott Bay make this construction approach impractical.

I-135-004

The Bored Tunnel Alternative has been identified as the preferred alternative because it best meets the project's purpose and need. With this alternative replacing the Elliott Bay Seawall is a separate project led by the City of Seattle. The environmental review process for this project meets all NEPA and SEPA requirements.