DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

May 21, 2010 RT10/09-336981

Ms. Michelle Matson
3931 Gail Street
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS Section 4.8. The Project primarily will be set in an urban context where visual change is expected and differences in scales of structures are typical. The visual effects on Honolulu's Downtown, including the Aloha Tower, Irwin Park, Dillingham Transportation Building, and Mother Waldron Neighborhood Park, are discussed under the Kalihi to Ala Moana Center Landscape Unit, discussed in Section 4.8.2 of the Final EIS. The Project will comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act, and is coordinating with the regulatory

agencies responsible for compliance.

The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment. DTS will coordinate with the Department of Planning and Permitting (DPP) to identify the particular needs of each view; however, changes to some views will be unavoidable. Depending on the degree of view obstruction or blockage, some view changes will be substantial. The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and/or buildings.

The following mitigation framework (see Section 4.8.3 Environmental Consequences, in this Final EIS [Visual and Aesthetic Conditions]) will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

Design principles are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) and will be implemented in Final Design as mitigation measures to minimize visual effects. Specific design principles are listed in Section 4.8.3 and include: Overall Aesthetics, Station Design, Lighting and Landscaping criteria that will be implemented in Final Design as mitigation measures to minimize visual effects. In addition, the Project will provide passengers with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment.

The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako are discussed under the Kalihi to Ala Moana Center Landscape Unit. To minimize adverse visual effects and enhance visual and aesthetic opportunities, the City will consult with the Kakaako community for input on station design elements. Specifically, the Kakaako Station workshop will be held in conjunction with the Civic Center and Ala Moana Stations. In addition, design guidelines that establish a consistent design framework for the Project with consideration of local context will be developed and applied.

Preliminary effect determinations for Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, and Mother Waldron Park documented in the Draft EIS were reevaluated

in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d) issued by FTA on April 14, 2009. Analysis of the project's direct and indirect, and cumulative impacts to these properties, as described in the report, concluded that indirect, visual effects to the setting of Piers 10/11, Aloha Tower, and Irwin Park would not be adverse. However, the State Historic Preservation Division (SHPD) did not concur with these findings and the FTA accepted adverse effect determinations on these resources. In the Historic Effects Report, impacts to the Dillingham Transportation Building and Mother Waldron Park were determined to be adverse due to differences in pre-existing integrity and character-defining features of each resource. Direct impacts to the Dillingham Transportation Building, including property acquisition, were also determined to be adverse. The SHPD concurred with these determinations. Consultation with the SHPD has continued since release of the Draft EIS and the Historic Effects Report. Final determinations of effect and coordination details are presented in this Final EIS, Section 4.16. Mitigation of adverse impacts to historic resources is included in the Programmatic Agreement (Appendix H).

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure