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May 21, 2010 RT10/09-338275

Ms. Michelle Spalding 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 were considered in the visual and aesthetic analysis presented in the Final EIS. 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, Mother Waldron Neighborhood Park, and the Kakaako neighborhood are discussed under the Kalihi to Ala Moana Center Landscape Unit, discussed in Section 4.8.3 in this Final EIS. The City and FTA have complied with Section 106 of the National Historic

Preservation Act and Section 4(f) of the Department of Transportation Act as presented in this Final EIS, Section 4.16 and Chapter 5.

Inclusion of the viewer group's responses, received during the Draft EIS comment period, resulted in refinement of the visual impact rating for three key views. The refinement resulted in revised ratings from moderate to significant for Views 12, 14 and 15 in the downtown area. In addition, the discussion of protected views and vistas provided in this Final EIS includes new summary tables and new visual simulations that were not part of the Draft EIS. The analysis of protected views and vistas was provided in the Visual and Aesthetic Resources Technical Report (2008e); however, this Final EIS more clearly describes the visual effects on these resources.

The overall conclusions of the Draft EIS have not changed, but through these refinements, the following clarifications have been made:

- *Viewpoint 12. Visual impact rating refined to reflect that some views would be blocked and to expressly point out the contrast of project elements with Chinatown's historic character.*

- *Viewpoint 14. Visual impact rating refined to reflect the bulk and scale of the guideway and columns being out of character with the pedestrian-oriented environment at this viewpoint.*

- *Viewpoint 15: Visual impact rating refined to reflect the bulk and scale of the station as well as the other elements noted in the Draft EIS.*

The Draft EIS described several types of visual effects and the refinements reflect the same type of visual effects identified in the Draft EIS and shown in these Viewpoints in the Draft EIS. The Draft EIS concluded that changes to some views including protected views and vistas would be unavoidable, and the refinements confirmed this conclusion.

Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the project elements and their surroundings, the Final EIS acknowledges, as concluded in the Draft EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas.

The Project will introduce a new linear visual element to the corridor, and changes to some views will be significant (or, a high level of visual impact) and unavoidable. The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment.

The following mitigation framework (see Section 4.8.3 Environmental Consequences [Visual and Aesthetic Conditions], in this Final EIS) 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's TOD program within the Department of Planning and Permitting.*

- *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.*

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

Although changes in visual resources or view planes and the viewer response will be high or significant in some areas, view changes are not likely to be obtrusive in wider vistas or regional panoramic views where the project elements serve as smaller components of the larger landscape

The visual effects on Honolulu's Downtown, including Mother Waldron Neighborhood Park and the Kakaako neighborhood 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.

The visual effects on Irwin Park are not specifically mentioned in Table 4-10 of the Draft EIS. However, they are part of the larger views assessed in Viewpoint 15 in the Final EIS. The text on Page 4-88 of the Draft EIS has been refined in the Final EIS to clarify the visual impact analysis presented in the Draft EIS as described above.

Preliminary effect determinations for DOT Harbors Division Offices, Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, Chinatown Historic District, and Mother Waldron Playground documented in the Draft EIS were reevaluated in the Honolulu High-Capacity Transit Corridor Project Historic Effects Report (RTD 2009) issued by FTA on April 14, 2009. Analysis of the project's direct, indirect, and cumulative impacts to these properties, as described in the Historic Effects Report include effects to setting. Consultation with the SHPD has continued since release of the Draft EIS. This Final EIS summarizes all effect

determinations to historic properties and Section 106 consultation as described in text and tables of Section 4.16, Archaeological, Cultural, and Historic Resources.

As described in Section 4.2, Land Use in this Final EIS and expanded upon in the Honolulu High-Capacity Transit Corridor Project Land Use Technical Report (RTD 2008b), the Project is consistent with State and local plans.

The specific wording in the Draft EIS on Pages 4-44 and 4-45 states that "As the alignment transitions to Halekauwila Street, a relatively narrow street, the adjacent buildings become primarily high-rise government office buildings with little or no open space between them. Views of the alignment would be limited to short segments as the guideway crosses city streets since high-rise buildings and tall trees already obstruct views." It is acknowledged that tree canopies and building setbacks enhance the public's visual experience of the area and as explained on Page 4-88 of the Draft EIS, canopies of several mature monkeypod trees along Halekauwila Street would be trimmed. The guideway and columns would also block views from the fourth- and fifth-story windows of adjacent offices and residences, creating additional shade and shadows, and "...the overall visual effects in this area would be high."

Section 4.13.3, Environmental Consequences and Mitigation, of the Draft EIS states that, "effects to trees would be mitigated by transplanting existing trees or planting new ones." Additional information on street trees is offered in the Honolulu High-Capacity Transit Corridor Project Street Trees Technical Report (RTD 2008l). Street trees along the Project alignment are discussed in Section 4.15 Street Trees, of the Final EIS. Affects to street trees would be mitigated by transplanting existing trees where possible, or planting new ones. Other possible mitigation measures are discussed in Section 4.15.3 Environmental Consequences and Mitigation in the Final EIS.

Within the Kakaako area, land uses adjacent to the alignment include two- and three-story walk-up apartments and commercial uses. Because Kakaako has been designated a redevelopment area, changes in land uses to transit-oriented development is likely. This may result in a change in character along the alignment, especially near stations. Substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built and additional residential and commercial development is planned. The elevated transit structure would not create a barrier to pedestrian or other modes of travel.

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