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Mr. Bob Loy, Director of Environmental Programs
The Outdoor Circle
1314 South King Street, Suite 306
Honolulu, Hawaii 96814

Dear Mr. Loy:

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:

Visual

The island's unique visual character and scenic beauty was considered in the visual and aesthetic assessment presented in the Draft and Final EISs. Although, the specific wording that the commenter has referenced in the Draft EIS is not entirely accurate as quoted, it is acknowledged that the guideway and stations would noticeably contrast with smaller size buildings and the affect the undeveloped character of the Ewa plain and other areas along the

alignment. In addition, views in the Downtown and the other areas referenced by the commenter, including protected mauka-makai views, would be blocked, and some views would change substantially, resulting in substantial visual effects. Section 4.8 of the Final EIS further assesses protected mauka-makai views from what was presented in the Draft EIS (see Tables 4-10 through 4-14 and Figures 4-39 through 4-50). The assessment acknowledges that some view obstructions and changes to views will be unavoidable and substantial. They will be most noticeable where the guideway and stations are nearby or in the foreground of views. This includes views for those who travel near the alignment. The degree of visual effect will vary with the alignment orientation, guideway and station height, and height of surrounding buildings and trees, along with the viewer's expectations of view quality. It is also noted that the project will conflict with Honolulu Ordinance Section 24-1.4 where project elements such as the guideway would block protected mauka-makai view corridors. 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 following measures 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 the 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.*

It should also be noted that the Project will provide users with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, Environmental Consequences and Mitigation under the heading Design Principals and Mitigation, specific environmental, architecture and landscape design criteria are listed that will help minimize visual effects of the Project.

Street Trees

Street trees along the Project alignment are discussed in Section 4.1, Street Trees, of the Final EIS. Twenty-eight Notable true kamani trees on the makai side of Dillingham Boulevard will be removed. As you stated in your letter, trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved. The State Historic Preservation Division has

determined that the removal of 28 true kamani trees on Dillingham Boulevard is an Adverse Effect as illustrated in Section 4.15.3 of this Final EIS. The Project would not affect any trees on Kapiolani Boulevard. Effects to street trees would be mitigated by transplanting existing trees or planting new ones, where possible. Trees suitable for transplanting that are displaced by construction will be relocated to City project nursery until they can transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. The location where street trees will be transplanted will be selected based on project-specific criteria that could include the following:

- *Areas where existing landscaping will be lost along the corridor.*
- *Areas where opportunities exist for enhancing existing streetscapes near the study corridor.*
- *Areas where stations and parking lots will be constructed.*
- *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites.*

In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

Your comments regarding undergrounding utilities are noted. The open portion of the guideway structure contains tensioning cables and is not available for utilities. Also, future maintenance access for the utilities would require openings in the structure, which would weaken the structure. The access would either have to be provided from below with a lift-truck or require closure of the transit operations from above. As stated in Section 4.15.3 of the Final EIS: 28 Notable true kamani trees on the makai side of Dillingham Boulevard will be removed. Trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved.

The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and

FTA. If the future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. Thus, the Project will not affect trees Koko Head of Ala Moana Center.

Specific sites for relocating and planting trees will be considered during the Final Design phase when plans for new plantings will be prepared by a landscape architect. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

Tree Protection

As discussed in Chapter 4, Section 4.18.8 of the Final EIS, street trees that require pruning for construction activities will be pruned more extensively than they will later for system operation. For street trees that will not be affected by system operation, a tree protection zone will be established during construction. The protection zone will be delineated by protective fencing.

Landscaping Plans

The ongoing station area planning process involves numerous aspects of transit system design. The process addresses design and planning issues in an integrated manner and focus on the characteristics and preferences of the communities adjacent to each station.

As stated in Section 4.7.3 of the Draft EIS, the measures listed below will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project will create.

- *Develop and apply design guidelines that establish a consistent design framework for the Project with consideration of local context.*
- *Retain existing trees where practical and provide new vegetation.*
- *Shield exterior lighting.*
- *Coordinate project design with the City's transit-oriented planning and Department of Planning and Permitting Consult with communities surrounding each station for input on station design elements.*

As discussed in response to a previous comment, specific sites for relocating and planting trees will be considered during the Final Design phase when plans for new plantings will be prepared by a landscape architect.

Signs and Advertising

DTS has developed specifications and design criteria that establish Project requirements. Commercial advertising on the system will be in compliance with State and City laws.

Utility Lines

As discussed in Section 4.18.2 of the Final EIS, "Communication and coordination have been initiated with the affected utility agencies and companies and will continue throughout design and construction." Further, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered and affected by construction of the fixed guideway." In addition, "Along several roadway corridors, most existing overhead utilities in conflict with the guideway and safety clearance requirements will be relocated underground. Existing overhead electrical and communication utilities not in conflict with the aerial guideway and safety clearance requirements will remain overhead. Coordination will occur with emergency services and utility companies to ensure that utility relocations meet their needs and that sufficient clearance is provided. The City will evaluate relocation of utilities that are in conflict with the fixed guideway during preliminary design.

Final Observation

As stated in the Executive Summary of the Final EIS, "The purpose of the EIS is to provide the City and County of Honolulu Department of Transportation Services Rapid Transit Division, the Federal Transit Administration, and the public and interested parties with the information necessary to make an informed decision, based on full and open analysis of cost, benefits, and environmental impacts of alternatives considered." This analysis, which is detailed in the Final EIS and related documentation, includes environmental commitments to avoid and/or reduce environmental effects. Further, additional analysis was included in the Final EIS based on comments received from the public on the Draft EIS.

Section 4.8.2 of the Final EIS states that the Outdoor Circle provided data or input on the visual assessment for the Project. In addition, Section 4.15.1 (Street Trees) states that coordination with Outdoor Circle was initiated at the start of the NEPA process and that coordination will be ongoing as the Project progresses.

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