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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, Bishop Street, Chinatown Historic District, 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.

Comment [k1]: Address Bishop st and Chinatown Historic District
PM: Complete

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 Embarcadero Freeway in San Francisco was an elevated highway, not rail, and thus is not directly comparable to this project.

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 cCity will implement tThe 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 ~~design~~ context.*
- *Coordinate the project design with the City's TOD program within the Department of Planning and Permitting.*
- *Conduct public involvement workshops to consult ~~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.

Some views and vistas protected by City development plans will change as a result of the project, including public views along streets and highways, mauka-makai view corridors, panoramic and significant landmark views from public places, views of natural features, heritage resources and other landmarks. Depending on the degree of view obstruction or blockage, some changes in view will be significant. Viewers' response to these changes will vary with their exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and buildings. View changes will be less notable in wider vista or panoramic views where the project elements are smaller components of the larger landscape. Generally, the project elements will not be dominate features in these 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

Comment [PAM2]: Not appropriate addition.

Comment [k3]: Through what means, specifically?
PM: Complete

Comment [k4]: What does this mean?
PM: text inserted
Complete

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 (Maritime Passenger Terminal), Aloha Tower, Irwin Park, Dillingham Transportation Building, Chinatown Historic District, and Mother Waldron Neighborhood 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~~ SHPO 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 and in Chapter 5.

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.

Comment [k5]: This doesn't address the Maritime Passenger Terminal and Bishop Street views.
PM: the Maritime Passenger Terminal is the same thing as Piers 10/11. Bishop St views are discussed in the visual section of this response.
Complete

Comment [k6]: Is this the same as Mother Waldron Park? Ensure consistent names are used.
PM: the Playground is historic the Park is not –in the EIS these are analyzed as 2 distinct properties with 2 distinct names.
Complete

Comment [k7]: How has 4(f) been updated?
PM: yes
Complete

Comment [k8]: This doesn't account for views of trees.
PM: the point here is that tall trees sometimes obstruct views –no edit required-
Complete

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, Kaiāulu ʻo Kakaʻako Master Plan (HCDA 2008), changes in land uses to transit-oriented development are~~is~~ likely. This may result in a change in character along the alignment, especially near stations depending on local community input and what redevelopment plans administer. 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, cyclist or automobile ~~or other~~ modes of travel.

Regarding your comment about public concerns specific to historic sites the following text from Section 8.2.3 of the Final EIS explains the process and the efforts taken both prior to the Draft document and since its publication. The lead agency is responsible for complying with Section 106 of the National Historic Preservation Act. Section 106 requires the lead agency to "accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties..." [36 CFR 800.1(a)]. Although other parties are consulted for their input, the Federal agency has the authority to make all decisions. Extensive effort was made to identify, contact, and consult with groups entitled to be consulting parties relating to archaeological, cultural, and historic resources within the Area of Potential Effect (APE). The purpose of consultation was to identify archaeological, cultural, and historic resources and to discuss other issues relating to the Project's potential effects on such resources. Information was obtained from individuals and organizations likely to have knowledge of potential resources in the study corridor. A reasonable and good faith effort was made to identify Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the APE, and they were given opportunities to discuss issues and concerns.
In addition to consultation with the State Historic Preservation Officer (SHPO), the City also consulted with organizations and agencies with concerns regarding archaeological, cultural, and historic areas. This consultation included Hawaiian civic clubs that may have an interest in the Project. Letters sent by the FTA initiated an ongoing consultation process with the following groups (Section 106 consulting parties) to identify resources, consider project effects, and develop mitigation to limit the adverse effects of the Project:
:• Advisory Council on Historic Preservation
• U.S. Navy (U.S. Naval Base Pearl Harbor)
• Historic Hawaiʻi Foundation
• National Park Service
• National Trust for Historic Preservation
• University of Hawaiʻi Historic Preservation Certificate Program
• American Institute of Architects
• Hawaiʻi Community Development Authority

Comment [k9]: In what plan?
PM: Complete

Comment [k10]: Of what type?
PM: Complete

Comment [k11]: Include summaries of the planning process and public input process as the commenter is criticizing these.
PM: Complete

• Office of Hawaiian Affairs
• O'ahu Island Burial Council
• Hui Malama I Na Kupuna O Hawai'i Nei
• Royal Order of Kamehameha
• The Ahahui Ka'ahumanu
• The Hale O Na Ali'i O Hawai'i
• The Daughters and Sons of Hawaiian Warriors
• Association of Hawaiian Civic Clubs—and 15 individual civic clubs

Between July 28, 2009, and November 13, 2009, FTA and the City invited all consulting parties to participate in a series of meetings to develop the Programmatic Agreement (PA) (see Section 4.16, Archaeological, Cultural, and Historic, and Appendix H, Section 106 of the National Historic Preservation Act Programmatic Agreement). Appendix F includes copies of all Section 106 correspondence.

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