BOARD OF DIRECTORS
EXECUTIVE COMMITTEE

Joel Kurokawa
*President*

Marcy Fleming
*1st Vice President*

Jean Campbell
*2nd Vice President*

Maureen Murphy
*3rd Vice President*

Betsy Connors
*4th Vice President*

Diane Harding
*Treasurer*

Yvonne Lim Warren
*Assistant Treasurer*

Teresa Trueman-Madriaga
*Secretary*

Diane Anderson
*Advisor*

Steve Mechler
*Advisor*

Denise Soderholm
*Advisor*

Marcy Fleming
Bradley Totherow
*Finance*

BRANCHES

East Honolulu (O'ahu)

Kane'ohe (O'ahu)

Kapolei (O'ahu)

Kaua'i

Kona (Hawai'i)

Lani-Kailua ( O'ahu)

Maui

North Shore (O'ahu)

Waikoloa Village (Hawai'i)

Waimea (Hawai'i)

# THE OUTDOOR CIRCLE

RECEIVED
AUG 16 2010

August 16, 2010

Mr. Ted Matley
Federal Transit Administration
Region IX
U.S. Department of Transportation
201 Mission Street Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Re: FEIS Comments for Honolulu High-Capacity Transit Corridor Project

Aloha Mr. Matley and Mr. Yoshioka:

Thank you for the opportunity to provide further comments on this Final Environmental Statement (FEIS).

The Outdoor Circle (TOC) believes the City and County of Honolulu has failed to provide substantive responses or failed to explain mitigation measures to numerous issues raised in our comments on the Draft Environmental Impact Statement (DEIS) for this project.

**1. Concerns for View Planes and Community Intrusion**

The FEIS acknowledges most of our concerns over blockage of view planes—that "some view obstruction and changes to views will be unavoidable and substantial." But the FEIS claims these issues will be "most noticeable where the guideway and stations are nearby or in the foreground of views." In the FEIS section 4.8.3 the city explains the nearby visual intrusiveness will be mitigated by community sensitive architectural designs and then softened by a variety of landscaping schemes, tree plantings, etc. The FEIS states that much of the details of this work will be developed in concert with the communities as the project moves forward.

**While TOC concurs that some level of mitigation will be achieved through these efforts it will only superficially negate the substantial negative influence of the fixed guideway, transit stations and associated infrastructure on the neighborhoods through which the system will be constructed. Yes, landscaping and architectural detail will help soften the hardscape but it will do nothing to lessen the intrusiveness of the massive guideway and huge stations. Furthermore the landscape and architectural efforts will not mitigate or in any way lessen the impacts on view planes—many of them protected by existing law. No level of design or landscape can erase the physical, visual barricade being created to mauka-makai views for the entire length of the project. In this regard the FEIS fails to offer relief of any kind. And while the most ominous and destructive influences of the transit system will be felt, as the FEIS acknowledges, by those who live and work closest**

1314 South King Street, Suite 306 • Honolulu, Hawaii 96814
Telephone: 808.593.0300 • Fax: 808.593.0525 • Email: mail@outdoorcircle.org • www.outdoorcircle.org

**to the guideway and stations, the obstruction of view planes will impact far more people who are not near the system but whose mauka-makai views—many "protected" by law—will be interrupted for as long as the system remains in existence. The FEIS fails to acknowledge, much less offer adequate mitigation for this damage. These issues must be adequately addressed and true mitigation offered before a Record of Decision can be issued.**

**2. Street Trees**

The FEIS states that 550 trees will be removed and 300 transplanted as a result of the project. It states that removed trees will be replaced nearby with new trees. Trees targeted for transplanting temporarily will be held at a City nursery until needed. The FEIS offers no details on where the trees ultimately will be transplanted. Instead the FEIS states these details will be made known in "Final Design."

**Without committing to where plantings will take place or details of landscape designs it is virtually impossible to determine whether the proposed tree planting will mitigate the damage to communities along the route inflicted by tree removals. In its June 11, 2010 letter to TOC the City acknowledges that it doesn't know whether the Street Trees plans will properly mitigate the impacts on street trees during construction. "If new plantings will not offer equitable mitigation, additional younger trees could be planted that will, in time, develop similar benefits." This statement implies that the city already is aware that its Street Trees mitigation measures are inadequate. Yet it does not state that it will take additional measure, only that additional younger trees could be planted. Only in guaranteeing that additional trees will be planted will the city be offering equitable mitigation. This information should be publicly presented prior to the completion of a Record of Decision.**

**3. Tree Protection**

The City has pledged that pruning of trees that remain during construction will be done under the direction of a certified arborist and that other nearby trees will be protected by accepted arboriculture standards.

**TOC believes these measures will be adequate if carried out as prescribed in the FEIS.**

**4. Landscaping Plans**

The city has presented limited broad information about how it intends to use landscaping to mitigate the destructive visual elements of the Transit system. However, the more important details of how landscaping will be used to soften the system's visual impacts on neighborhoods will not be known until the "Final Design" after further consultation with local communities.

**In failing to provide specific details about landscape designs the City has made it impossible to determine the extent of mitigation that will be achieved by landscaping. These details must be publicly presented and their value weighed before a Record of Decision is issued.**

**5. Signs and Advertising**

**The FEIS states that commercial advertising on the system will be in compliance with State and County laws. However there is no mention of standards, or regulations for non-commercial signage**

**which could be substantial. These issues must be addressed prior to the issuing of a Record of Decision.**

**6. Utility Lines**

**The FEIS does not address questions raised in TOC's DEIS comments regarding the relocation of high voltage transmission lines along Kamehameha Highway in Aiea as mitigation for the disastrous loss of scenic mauka-makai view planes for residents mauka of the Transit line. Instead, no specific mitigation for the view plane loss is offered. This shortcoming must be corrected before a Record of Decision is issued.**

Respectfully,

Bob Loy
Director of Environmental Programs