

DEPARTMENT OF TRANSPORTATION SERVICES

**CITY AND COUNTY OF HONOLULU**

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RT2/09-299022R

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:

1. **Concerns about Visual View Planes and Community Intrusion**

*The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. The Project will be set in an urban context where visual change is expected and differences in scale of structures are typical. The visual effects on Honolulu's Downtown are discussed under the Kalihi to Ala Moana Center Landscape Unit heading in Section 4.8.3 of the Final EIS.*

~~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, The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. In addition, viewers in upper stories of some buildings would be affected by light and glare from trains traveling on the guideway.~~

~~It is acknowledged that the guideway and stations would will 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 will be blocked, and some views would will 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). Protected views and vistas are identified in policy documents that govern the project corridor and include protected mauka and makai views, as well as views of prominent landmarks. The protected views and vistas are identified in Figures 4-17 to 4-19. These figures are included in the Visual and Aesthetics Resources Technical Report (RTD 2008e).~~

~~Furthermore, protected views and vistas, including mauka and makai views and views of prominent landmarks in the study corridor are identified in City development plans, including the Ewa Development Plan, Central O'ahu Sustainable Communities Plan, and the Primary Urban Center Development Plan. The Project is consistent with the land use objectives included in these plans (See Final EIS Appendix J).~~

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.

Section 4.8.3 of the Final EIS, Environmental Consequences and Mitigation under the heading Design Principals and Mitigation, lists specific environmental, architecture and landscape design criteria to minimize visual effects of the Project. The Final EIS commits to 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.

**Comment [fc1]:** Are the quotes not accurate or is the context not accurate. I can imagine the author of the comment will be sensitive to this. Perhaps -

Although some wording from the DEIS has been taken out of context, it is acknowledged that . . . .  
Text revised  
Completed

**Comment [fc2]:** Take out "woulds" and "coulds" and replace with wills - b/c the FEIS should specifically commit to a particular vision for how this project will impact the community.  
LZ - edit accepted  
Complete

**Comment [Z3]:** Rejected edit as SUBSTANTIAL is defined in the FEIS per previous edits -this is not an arbitrary word choice.  
Complete

**Comment [fc4]:** What protects these views? Is there any way to compensate those who are losing views? Does Hawaii guarantee property owners access to certain view-sheds?  
LZ Added text COMPLETED

**Comment [fc5]:** Okay - here's the reference, so why say it twice?  
LZ - text responds to comment COMPLETED

**Comment [fc6]:** Where in the document?  
LZ reference provided COMPLETED

**Comment [fc7]:** This sounds vague. Where is it in the document? What is the timing and who are the partners?  
LZ reference provided COMPLETED

- 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. Landscaping, and streetscape improvements, and utility relocation will serve to mitigate potential visual impacts.

It should also be noted that the Project will provide rail 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.

## 2. Street Trees

The city intends to fully mitigate the Project's impacts to Honolulu's urban street trees Streetforest. Section 4.15, Street Trees, of the Final EIS states explains that:

*Tree removal will be minimized to the greatest extent possible, but pruning is likely next to the guideway. Twenty-eight "Notable" true kamani trees along Dillingham Boulevard will be removed. Approximately 100 street trees will be pruned, 550 will be removed, and 300 will be transplanted. Mitigation measures will consist of transplanting existing trees or planting new ones. Pruning will be in compliance with City and County ordinances and require supervision by a certified arborist. The City will coordinate with the State of Hawai'i Department of Transportation landscape architect.*

*trees along the Project alignment are discussed in Section 4.1, Street Trees, of the Final EIS. As requested, Section 4.15 of the Final EIS identifies the specific tree species to be transplanted.*

*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

**Comment [fc8]:** Sounds vague. Would you be willing to "partner" w/ communities?  
LZ communities is the term used by the City in these input sessions **COMPLETED**

**Comment [fc9]:** Does this include a commitment to landscaping?  
LZ, Yes, the project is committed to landscaping **COMPLETED**

**Comment [fc10]:** Identify?  
LZ Consider is the correct term for this effort. **COMPLETED**

**Comment [fc11]:** Doesn't have to be part of the structure - but couldn't it go underground?  
LZ existing underground utilities also need to be relocated. The project does not include putting all utilities underground. **COMPLETED**

**Comment [fc12]:** Does the FEIS commit to enhanced landscaping and street improvements to ease the project into the surrounding area?  
LZ landscaping is included. **COMPLETED**

**Comment [fc13]:** There is a specific question about removal of 13 fully mature Monkey pod trees from Kapiolani Blvd near the University. I don't know that the response specifically addresses this and I don't see a section of the FEIS that identifies this particular area.  
LZ Section 4:15 addresses this **COMPLETED**

**Comment [fc14]:** Is there additional mitigation to correct that?  
LZ This has all been agreed to by the consulting parties. **COMPLETED**

be relocated to the City project nursery until they can be 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.

Specific sites for relocating and planting trees will be considered during the Final Design phase when plans for new plantings will be prepared by the Project's landscape architects. 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.

### 3. 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.

### 4. 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 4.7.384.8 of the Draft Final EIS addresses Visual and Aesthetic Conditions and mitigation measures derived in accordance with USDOT guidance.

**Comment [fc15]:** When does this happen? Maybe the Outdoor Circle could be involved in the development of these plans? LZ the City is coordinating development of the landscape plans. **COMPLETED**

**Comment [fc16]:** The comment states that "800 street trees" would be transplanted. After re-evaluation, the FEIS shows in Table 4-32 that 550 trees will be removed, 300 or 55% of which could be transplanted. LZ - there were refinements between the Draft and Final EIS that reduced impacts **COMPLETED**

**Comment [fc17]:** The document actually states, "potential" mitigation measures. This should be more precise and should commit to specific mitigation rather than keeping it vague.

Include a specific citation to the USDOT guidance for highway projects. Edits to text made -reference to USDOT is in 4.8 this is in our visual tech report which is referenced in this section: The assessment methodology used for this analysis is adapted from the Federal Highway Administration's (FHWA) Visual Impact Assessment for Highway Projects (Publication No. FHWA HI-88-054). **COMPLETED**

**Comment [fc18]:** 4.8 of the FEIS does not include the bullets below that were in the DEIS. Significant text edits **COMPLETED**

In Section 4.8.3 of the Final EIS, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project. The City will implement the following measures to minimize negative visual effects and enhance the visual and aesthetic opportunities that the Project 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 transit-oriented development program within the Department of Planning and Permitting.
- Conduct public involvement workshops to consult with the communities surrounding each station for input on station design elements.
- Consider specific sites for landscaping and trees during Final Design 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 visual 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.

The mitigation section of this Final EIS has also been expanded to include detailed mitigation measures. 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 April 2010 Honolulu High-Capacity Transit Corridor Project Environmental Impact Statement 4-69 in the Draft EIS), that 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 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.

**Comment [fc19]:** Where are these? This following paragraph about mitigation basically says that the effects are unavoidable and cannot be mitigated. Final paragraph on 4-68.

~~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.~~

#### 5. **Signs and Advertising**

~~DTS has developed specifications and design criteria that establish Project requirements. Please see Section 4.8.3 of the Final EIS. Commercial advertising on the system will be in compliance with State and City laws.~~

#### 6. **Utility Lines**

~~In response to your specific suggestion of relocation utilities "along the underside of the fixed guideway," the open portion of the guideway structure contains tensioning cables and is not available for utilities. 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 discussed in Section 4.15.3 twenty-eight 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.~~

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.

**Comment [fc20]:** Are these specific bullet points in the FEIS? I didn't find them in Chapter 4. These would be a good addition at the end of the final paragraph that starts on 4-68.  
See above text edits  
COMPLETED

**Comment [fc21]:** Please include a citation so that the commenter can find those documents.  
COMPLETED

7. **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 Project responds to unmet demand for transit infrastructure that accommodates current residents and visitors and anticipates future demographic trends. The challenge is to reconcile the need to provide a public transportation system that is safe, accessible, and convenient while preserving aspects of the community that are integral to its character and values. This project will enable the City to concentrate growth in existing urbanized and adjacent areas on Oahu in the decades to come. By reducing the overall number of vehicle miles traveled through expanded public transportation, DTS and FTA are promoting environmental sustainability, congestion reduction, and increased mobility for a diverse population, which will improve the overall quality of life for the majority of Honolulu residents and visitors.~~

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

**Comment [PAM22]:** This text is not in the FEIS and has been deleted. **COMPLETED**

**Comment [Z23]:** This text was added by Faith Cole - I do not think it belongs in this letter and so was deleted. **COMPLETED**

**Comment [Z24]:** Faith Cole added the following text: and ongoing feedback about - this is not the approved and agreed upon response - deleted **COMPLETED**