

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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May 21, 2010

RT10/09-336981

Ms. Michelle 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 was considered in the visual and aesthetic analysis presented in the Final EIS Section 4.8. 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, Bishop Street, Chinatown Historic District and Mother Waldron Neighborhood Park, are discussed under the Kalihi to Ala Moana Center Landscape*

Unit, discussed in Section 4.8.2 of the Final EIS. The Project ~~will comply~~ complies with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act, and ~~is coordinating~~ on with the regulatory agencies responsible for compliance ~~is ongoing as documented in Section 4.16 and Chapter 5 of this Final EIS.~~

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

**Comment [PAM2]:** completed

**Comment [k3]:** Refer to EIS Sections/ Appendices  
PM: completed

The guideway and some stations will partially block mauka-makai public views from streets that intersect the alignment. DTS will coordinate with the Department of Planning and Permitting (DPP) ~~to identify the particular needs of each view;~~ however, changes to some views will be unavoidable. Depending on the degree of view obstruction or blockage, some view changes will be substantial. The viewer's response to this change will vary with exposure and sensitivity and depend on the alignment orientation, guideway and station height, and height of surrounding trees and/or buildings.

**Comment [k4]:** How will this be achieved, specifically?  
PM: more explanation later this not needed  
completed

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

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 Final 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.

**Comment [PAM5]:** We changed high to significant in the FEIS. The new paragraph above explains this.  
Completed

The City will implement the following mitigation framework (see Section 4.8.3 Environmental Consequences, in this Final EIS [Visual and Aesthetic Conditions]) ~~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 TOD planning and DPP.
- 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 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.

**Comment [PAM6]:** This insertion is inaccurate.  
Completed

**Comment [k7]:** Through what means, specifically?  
PM: text added  
Completed

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

Design principles are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) and will be implemented in Final Design as mitigation measures to minimize visual effects. Specific design principles are listed in Section 4.8.3 and include: Overall Aesthetics, Station Design, Lighting and Landscaping criteria, ~~that~~ These will be implemented in Final Design as mitigation measures to minimize visual effects. In addition, the Project will provide passengers with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment.

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

**Comment [k8]:** What does this mean?  
PM: text added to clarify  
Completed

**Comment [PAM9]: Question and Universal Comment**  
If Project staff agrees with this deletion all visual letters will need to be amended.

**Comment [az10]:** This language is included in the Final EIS (page 4-69) in a general discussion about environmental consequences.

Pam or Lisa please review the letter and see if this is applicable to the question asked. If it is, then leave it.

**Comment [PAM11R10]:** This does address concerns Matson addressed in her letter. The text will remain.

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

Preliminary effect determinations for Piers 10/11, Aloha Tower, Irwin Park, Dillingham Transportation Building, and Mother Waldron Neighborhood Park Playground documented in the Draft EIS were reevaluated in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009d) issued by FTA on April 14, 2009. Analysis of the project's direct and indirect, and cumulative impacts to these properties, as described in the report, concluded that indirect, visual effects to the setting of Piers 10/11, Aloha Tower, and Irwin Park would not be adverse. However, the State Historic Preservation Division Officer (SHPD SHPO) did not concur with these findings and the FTA accepted adverse effect determinations on these resources. In the Historic Effects Report, impacts to the Dillingham Transportation Building and Mother Waldron Neighborhood Park were determined to be adverse due to differences in pre-existing integrity and character-defining features of each resource. Direct impacts to the Dillingham Transportation Building, including property acquisition, were also determined to be adverse. The SHPD SHPO concurred with these determinations.

Consultation with the SHPO subsequent to the Draft EIS resulted in revised Section 106 effects determinations to properties from no adverse effect to adverse effect—this includes Chinatown Historic District. The Draft EIS stated that the impact to these properties would be de minimis. Since de minimis impact applies to historic properties that have a no adverse effect determination under Section 106, an avoidance alternative is included in Chapter 5 of this Final EIS for Chinatown Historic District.

Consultation with the SHPD SHPO has continued since release of the Draft EIS and the Historic Effects Report. Final determinations of effect and coordination details are presented in this Final EIS, Section 4.16 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 Chapter 5s. Mitigation of adverse impacts to historic resources is included in the Programmatic Agreement (Appendix H).

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 'o Kaka'ako Master Plan (HCDA 2008), changes in land uses to transit-oriented development are 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

**Comment [k12]:** This doesn't address Bishop Street, Chinatown Historic District, Waterfront, and Kaka'ako  
PM: Matson's issue with Bishop St was specifically about views—that has been addressed above. Additional text added for CHD—of which the waterfront is part of --Kaka'ako is below  
**Completed**

**Comment [k13]:** How was 49f) been updated?  
PM: Ch 5  
**Completed**

**Comment [k14]:** In what plan?  
PM: added  
**Completed**

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**Comment [k15]:** Of what type?  
PM:  
**Completed**

**Comment [k16]:** Include summaries of the planning process and public input process as the commenter is criticizing these.  
PM: **Completed**

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 Hawai‘i Foundation
- National Park Service
- National Trust for Historic Preservation
- University of Hawai‘i Historic Preservation Certificate Program
- American Institute of Architects
- Hawai‘i Community Development Authority
- 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

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[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