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May 21, 2010 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 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.

It is acknowledged that the guideway and stations 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 (Honolulu Ordinance Section 24-1.4), will be blocked, and some views 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 Principles 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 to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that 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. Landscaping, streetscape improvements, and utility relocation will 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.

2. ***Street Trees***

The city intends to fully mitigate the Project's impacts to Honolulu's street trees. Section 4.15, Street Trees, of the Final EIS includes information about notable trees and 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.*

As requested, Section 4.15 of the Final EIS identifies the specific tree species to be transplanted.

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 mitigation for which is detailed in the Programmatic Agreement agreed to by all of the following consulting parties: X, Y, and Z. 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 the 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.*

Comment [fc1]: Is there additional mitigation to correct that?
LZ This has all been agreed to by the consulting parties. COMPLETED

Comment [fc2]: Add some explanation of what it means when there is an adverse effect - and what specifically is being done to mitigate. If not the specifics at least include a reference to the PA doc and where the commenter can find it as well as the names of the consulting parties. Otherwise, the sentence doesn't really provide any details.

Comment [eaz3]: Agreed. The PA provides more specific mitigation than may have been provided in the text of the FEIS, at least according to what is included in the mitigation table. The mitigation table, the FEIS discussion, and this letter should cross reference to the historic tree discussion in the PA.

Could also mention opportunities for further consultation with station-area designs.

Comment [eaz4]: The mitigation table says that the City will coordinate and consult with other agencies and stakeholders (including the Outdoor Circle) on the final design of the streetscape affected by the project. I did not see in the mitigation table that the city is consulting with HDOT.

- *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.

Comment [fc5]: 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 [eaz6]: The text of the letter needs to indicate that the City is coordinating and that one of the mitigation measures described in the Mitigation Commitments summary includes coordinating and consulting with other agencies.

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.

Section 4.8 of the Final EIS addresses Visual and Aesthetic Conditions and mitigation measures derived in accordance with USDOT guidance. The assessment methodology used for this analysis is adapted from the FederalHighway Administration's (FHWA) Visual Impact Assessment for Highway Projects (Publication No. FHWA HI-88-054).

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.

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***

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.

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 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.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure