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Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Wayne Y. Yoshioka, Director

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement

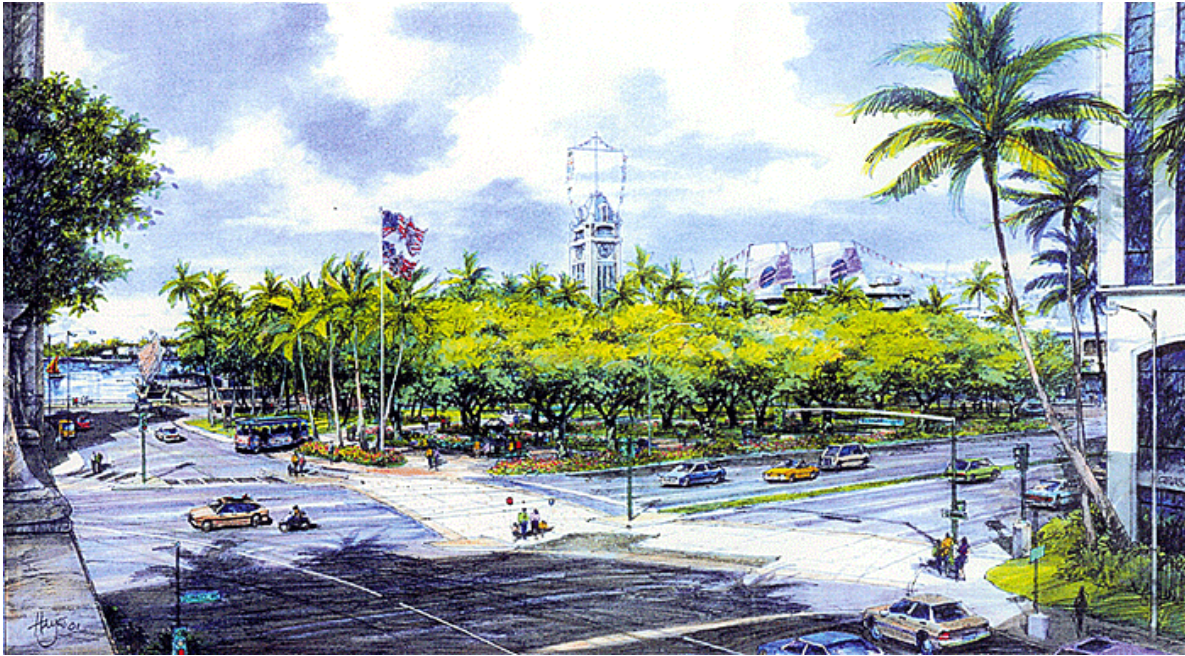
Dear Sir:

The following comments center on the significance of the Honolulu Waterfront as a historic complex, which is greatly understated and poorly depicted in the subject Draft EIS. The callous insensitivity and abandonment of sound planning and preservation practices demonstrated by the promoters of the proposed project destined to blight this historic complex, across which the subject elevated industrial infrastructure is proposed to span, is appalling.

The Honolulu Waterfront is representative of Honolulu's history from the days of Kamehameha's strategic harbor village, to a Pacific port that welcomed visitors by clipper ship and exported sugar cane across the seas, to today's destination for cruise ships and container cargo essential to the State's sustainability. The permanent visual damage to the appearance and experience of this historic area caused by the proposed industrial infrastructure will be irreparable.

Aloha Tower has long been a beacon that has welcomed travelers to Honolulu. Irwin Memorial Park was Honolulu's first beautification project as the landscaped companion to Aloha Tower, and both landmarks are listed on the Hawaii Register of Historic Places. Together they were, and remain, the landscaped gateway to Honolulu for thousands of residents and visitors alike.

As a family descendent of those who deeded Irwin Memorial Park in trust to the Territory of Hawaii, and writer of the nomination of this site for the Historic Register, I have a vested interest in the protection and preservation of this historic open space held in the public trust. Irwin Memorial Park was indeed a landscaped centerpiece park as intended by the donors until the federal government converted a portion of it into a World War II military parking lot. Since that time plans have been commissioned for the Park's restoration, which has been part of ongoing planning discussions with the State's Aloha Tower Development Corporation.



**HONOLULU WATERFRONT'S FOUR REGISTERED HISTORIC SITES:
ALOHA TOWER AND RESTORED IRWIN PARK WITH THE HARBOR AND PASSENGER TERMINAL BEYOND
AS VIEWED FROM THE DILLINGHAM TRANSPORTATION BUILDING ON BISHOP STREET**

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF VALUED PUBLIC RESOURCES

One of the most significant adverse impacts of the proposed elevated steel-on-steel heavy rail system is the irreparable blight it will implant through the vital heart of the Downtown Honolulu Waterfront and beyond. This obtrusive blight will impact five protected registered historic sites along the proposed Waterfront route – specifically the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park beyond.

Because of the City's requirement for federal funding for the proposed elevated rail project, there must be compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure slicing across the historic waterfront will substantially visually impair and block the views of these historic resources, i.e., the scale of the infrastructure would overwhelm the appearance of the adjacent historic resources and would cause the loss of integrity of setting, feeling and association of these historic sites and their scenic quality, scale and prominence within the visual environment of this significant location. The historic public view corridors to Honolulu Harbor from Bishop Street, Fort Street, and the Chinatown historic district will be similarly substantially impaired.

The Draft EIS clearly inaccurately accounts for these significant cumulative adverse effects and fails to adequately evaluate the effects of the proposed project on the view corridor. According to the Code of Federal Regulations, 36 CFR Part 800, significant effect is defined as “alteration of the characteristics of a historic property qualifying it for inclusion or eligibility for the National Register,” and adverse effect is constituted as, among other things, “introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic feature.”

The Draft EIS states on page 2-37 that Irwin Memorial Park “does not derive a substantial part of its value from its visual setting” and “the project would not substantially impair aesthetic features that are important contributing elements of the property.” The Draft EIS overlooks the visual significance of Irwin Memorial Park’s landscaped open space together with three other registered historic structures within the uninterrupted view plane. Visually sensitive resources include landmarks, significant views and vistas, view corridors, and historic sites. Because of the proximity and placement of these historic sites it is the views within this historic complex associated with the sites, i.e., to, from and around them, that are significant. A flat roadbed does not adversely impact view planes, corridors or sight lines as they relate to the historic site, but massive rail infrastructure built to thirty (30) feet in height with “visual, atmospheric, and audible elements” would have adverse effects “that diminish the integrity of the property’s significant historic feature,” and would thus appear to qualify the historic site for protection under Section 4(f).

The visual effects of the proposed project are listed on Table 4-10, and the visual quality of Irwin Park and Aloha Tower is acknowledged to be high. However, the Draft EIS curiously claims that the adverse visual effect of the proposed project on the visual integrity of Irwin Park and Aloha Tower will be “moderate” and “low” when in reality the overall visual effects in this area would be significantly high. Further, the Draft EIS provides a degree of self-contradiction by acknowledging on page 4-88 that “the guideway and columns would change the visual character of the streetscape and substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park. Overall visual effects in this area would be high.” Moreover, the Draft EIS flies in the face of moral logic and public policy by blindly declaring on page 4-44 that “The transit system would have little effect on the integrity of the historic districts or their uses,” and thus falls flat in assessing the affected visual environment’s character and quality.

Further, in both text and depiction the Draft DEIS ignores the high visual quality of this historic complex as approached ewa-bound from the Diamond Head direction, makai from Bishop Street and the historic Dillingham Transportation Building, and makai from Fort

Street and historic Walker Park to Aloha Tower. These more prominent view planes are superior to the alternate perspectives apparently arbitrarily chosen for the Draft EIS, and if superimposed with the elevated rail infrastructure these views would demonstrate the true significant adverse visual effects of the proposed elevated rail infrastructure proposed to span the Honolulu Waterfront from Chinatown to the Federal Building.

The proposed project's cumulative adverse visual and aesthetic impacts to the Honolulu Waterfront and its historic sites would conflict with established policy documents, specifically the Oahu General Plan (Objective B, Policies 2 and 3; Objective E, Policies 4,5 and 9), the Primary Urban Center Development Plan (Objective 3.1.2 and Policy 3.1.2) and the Revised Ordinances of Honolulu (Chapter 21, Article 9, Section 21-9.60), as follows:

- Substantially visually changing and contextually impacting the entire Downtown Honolulu Waterfront area, which is both a historic and scenic asset.
- Positioning elevated infrastructure adjacent to and/or in the foreground of existing historic sites and views
- Altering existing makai views and mauka view corridors
- Introducing dominant features in the views, i.e., elevated infrastructure and expansive station elements
- Substantially contrasting with the pedestrian scale and character of the streetscape
- Substantially affecting the aesthetic setting of the historic sites

Thus the elevated infrastructure and stations will irretrievably alter the significant views and sense of historic place of the Honolulu Waterfront. The visual impact of overpowering industrial infrastructure will ruin the waterfront experience for residents and visitors alike for generations to come, including motorists traveling along the waterfront and pedestrians crossing the roadway under the overshadowing monolithic infrastructure. Many major viewer groups who now enjoy the attractive surroundings and experience of the Downtown Honolulu Waterfront will be sensitive to the visual change and will be adversely affected by the altered views and substantial changes in light and shadows around the massive elevated infrastructure.

It would therefore be a fatal mistake for Honolulu's future if the City forces intrusion of elevated transit blight on the Honolulu Waterfront and its historic mauka-makai harbor views. As a consequence, the vital visual historic character and integrity of the waterfront centerpiece of Downtown Honolulu and its Harbor will be lost. One only needs to consider the blight of the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others and does not continue to blunder forward.

Because of the high adverse impact to the visual quality of the Honolulu Waterfront, blocking views and clashing with historic buildings and open space in terms of size, scale and character, the Downtown Waterfront transit corridor route must be rerouted via available alternatives. The Draft EIS provides several Avoidance Alternative Alignments to minimize harm and ensure protection of valued features and sites along the transit route, and the Honolulu Waterfront is more than worthy of this consideration, action and protection. In addition, on January 28, 2009, the Honolulu City Council, as the elected policy-making body for the City and County of Honolulu, approved rerouting a major segment of the proposed rail corridor. If this cannot or will not be done for the Downtown segment, and because it will be impossible to mitigate the unyielding mass of the industrial elevated design framework to preserve significant visual resources, the proposed elevated rail system should be terminated in Iwilei with connection to a dedicated, flexible and convenient grade level Downtown circulator system serving the entire area.

The Draft EIS claims on page 4-44 that as the elevated rail alignment transitions from the Honolulu Waterfront to Halekauwila Street, a narrow local tree-lined road dating from the 1800's, there are "highrise buildings with little or no space between them" and "tall trees already obstruct views." In fact, the public buildings at this Civic Center end of Halekauwila Street, while not much taller than the train would be, are surrounded by mature healthy shade tree canopies and wide setbacks, which are in themselves are welcome comforts within the public visual experience of this district. Again, the visual integrity of this area would be hideously overshadowed, bisected and deformed by the massive industrial elevated rail infrastructure. Indeed, the Draft EIS states on page 4-88 that the "overall visual effects in this area would be high."

The Draft EIS also proposes to carve the elevated heavy rail route through Kaka'ako immediately adjacent to the next historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The Draft EIS states on page 4-89 that the proposed project "would substantially change views and contrast with the scale and character of the surrounding environment. Overall visual effects would be high.... Views of the horizon would be partially blocked... including mauka views from the park at Halekauwila Street and Cooke Street. The bulk and scale of the guideway and columns would conflict with the pedestrian-oriented streetscape."

Further, the revised Kaka'ako Mauka master plan designated Halekauwila Street and its extension to Kamake'e Street as a significant "promenade street," a pedestrian-friendly boulevard with wide tree-lined sidewalks and new low-rise residential neighborhoods. Thus

the proposed elevated steel-on-steel heavy rail transit infrastructure blight bisecting these planned Kaka'ako neighborhoods is also tragically misplaced.

There has been little, if any, consideration of the local context in this train proposal for Downtown Honolulu, or from Kaka'ako to the gateway of Manoa's green valley, as it has been railroaded through an uninformed planning process. Hundreds of mature trees that have been protected and preserved for decades are destined to be destroyed or otherwise removed in direct conflict with the Oahu General Plan (Objective A, Policy 9) and the Revised Ordinances of Honolulu (Chapter 41, Article 13). The Draft EIS discloses on page 4-89 that "Mature trees would be removed from Pi'ikoi Street through the Ala Moana Center Station area, substantially changing the character of the streetscape."

The condition and appearance of Honolulu's streets and public open spaces are important factors in, and essential attributes to, the visual character and quality for which Honolulu is known. Significant views and vistas in policy documents include protected mauka and makai views as well as views of prominent landmarks, and the environmental visual character and quality must be fully assessed along with any potential physical impacts.

In conclusion, it has become abundantly clear that the presently proposed elevated transit project is, in some significant aspects, contrary to the public interest. Very serious public concerns surround the City's disregard and neglect of the significant adverse impacts of the proposed elevated rail infrastructure. Specific to the complex of registered sites that include the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park and the Dillingham Transportation Building, along with Mother Waldron Park, this badly-planned project cannot, and must not, be allowed to proceed further to overshadow and overpower these significant historic sites and destroy the visual character and integrity of the Downtown Honolulu Waterfront.

Sincerely,

Michelle S. Matson

Michelle Spalding Matson