

February 6, 2009

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

RE: **Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement**

Aloha Mr. Yoshioka:

OVERVIEW

To paraphrase the Draft Environmental Impact Statement (DEIS), The Honolulu Transit Project is destined to become the most visually dominant and intrusive construction project in the history of Hawai'i. While its ability to ease traffic problems on O'ahu has been the subject of lengthy debate, its negative impact on the visual environment of this island cannot be denied and is virtually immeasurable.

The Outdoor Circle's review finds that the project's DEIS fails to adequately describe the cumulative impacts of the project and how those impacts will be mitigated with respect to view planes, street trees, landscaping, utility lines and overall intrusiveness in our communities. Additionally we do not find the information provided about the alternatives to contain enough detail to make an informed assessment of the project.

Throughout the comments provided in this document, all material in quotes and underscored have been copied word-for-word from the DEIS.

VIEW PLANES and COMMUNITY INTRUSIONS

The Honolulu High-Capacity Transit Corridor Project will become the single most dominant man-made feature in the State of Hawai'i. It will intrude upon "the open and undeveloped character" of the Ewa Plain. It will block views of parks, and historic sites in Pearl City. In the airport district it will "obstruct the views of East Loch and the Pearl Harbor historic sites" for hundreds of homes. Please provide details as to how these impacts will be mitigated. In Kalihi the raised guideway will be the "dominant feature in the views along Dillingham Blvd." In Chinatown the proposed project "blocks makai views," and will be "out of character with the pedestrian oriented environment" in one of the most historic and sensitive

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neighborhoods on the island. Again, no details are given as to how this will be mitigated. In order to analyze the full impacts of the project the EIS must provide specifics.

As it passes through the city's central business district, the guideway and the proposed Downtown Station will "be dominant features in the views along Nimitz Highway." It will "contrast substantially with the pedestrian character of the streetscape" and it will "substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park." Finally it will "block makai views" from numerous residences. "Overall visual effects in this area would be high." As the project approaches historic structures such as the two listed above more consideration must be given to alleviating the negative impacts the guideway will have. Please provide more information.

As the guideway heads to Ala Moana Center there will be more "block(ed) views on the fourth and fifth floors of residences and offices" and will "increase light and glare on upper story residences." Throughout this part of the city the project will "block protected mauka-makai views of the Ko'olau and Waianae Mountains; the ocean and Honolulu Harbor and Diamond Head, Punchbowl and Aliamanu craters" "Overall the visual effects in these areas would be high." Once again we ask what efforts the city will undertake to lessen these impacts.

The assessments made in the DEIS are mostly based upon predicted impacts on people from fixed locations. Barely mentioned is the fact that the project also will have enduring, significant negative impacts on anyone who travels near it, whether a Windward or North Shore resident or one of the millions of people who visit our island every year.

The document contains broad promises of designing various elements to minimize negative visual effects. However, the lack of specific descriptions of how to overcome the visual impacts leaves our organization with little confidence that damages to the visual environment can or will be considered as the project moves forward. It is imperative that the EIS provide further explicit detail.

In addition, the document offers little in the way of alternatives. We believe that alternatives that have a lesser impact on the scenic environment should be studied and detailed. Only then can an informed decision be made.

STREET TREES

Of equal concern to The Outdoor Circle is the fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It is an important part of Honolulu's appeal to both residents and visitors. But the system's chosen alignment will result in the removal of more than 800 street trees. About one-half to two-thirds of those trees will be transplanted to unspecified "appropriate areas," but that leaves a possible deficit of more than 300 trees with no mitigation to the environment for the tree removals. For the sake of island aesthetics, pollution reduction, oxygen production, storm water reduction and ambient temperature moderation the city must revise its mitigation

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plans so that the result of the project is a net increase of three shade trees for every one tree removed. Also, the EIS must be species specific as to what will be replanted.

Further, The Outdoor Circle knows how difficult it is to find available tree planting sites in our city. We believe the EIS must provide specific sites for tree relocations now. The language in the draft document is too vague. Please address this issue.

Of great distress is the proposal to eliminate “notable” trees in two separate areas. The project calls for the removal of 19 beautiful Kamani trees on the mauka side of Dillingham Boulevard near Honolulu Community College. It proposes keeping the Kamanis on the makai side which already have been severely pruned by HECO contractors to keep them away from the power lines. The result of this pruning has left these important trees barely recognizable. We believe the EIS must require that the power lines be placed beneath the fixed guideway or placed underground to eliminate additional blight. We also believe that keeping the badly misshaped Kamani trees while removing the beautiful, completely healthy trees across the street is unacceptable. The EIS should provide for the guide way alignment to shift to the makai side of Dillingham where the already compromised Kamanis could be removed instead of the beautiful trees on the mauka side.

Additionally, we find it completely unconscionable that the City would remove 23 beautiful, fully mature Monkeypod trees from Kapiolani Boulevard in the area of University Avenue as is proposed for the future alignment to the University of Hawai‘i. The Kapiolani Boulevard Monkey Pod trees are a community resource that must be preserved and protected as they currently exist. The City must rethink and adjust the transit alignment that would result in the removal of any of the Monkey Pod trees on Kapiolani Boulevard.

The DEIS briefly discusses how to mitigate the “substantial damage” to street trees. However the language is uncertain and unconvincing. It states that a contractor “would prepare new planting plans,” and that additional trees “could be planted to offset this impact.” The Outdoor Circle does not believe “would and could” are the kind of guarantees the people of Honolulu are looking for. The final EIS must specifically state how the City intends to fully, not partially, mitigate the loss to our urban forest.

TREE PROTECTION

The DEIS fails to present plans for protecting existing trees during construction. These include trees in close proximity to the project elements including all transit stations, the fixed guide way and all other infrastructure that will be constructed or installed as part of the project. This oversight could result in significant negative impacts to the trees, their canopies and/or roots resulting in the unintended damage or destruction of hundreds of trees. It is absolutely essential that the EIS include detailed tree protection plans that meet the standards of the International Society of Arboriculture (ISA). The plan also must state that all tree protection work will be supervised by qualified certified arborists who will be present during construction to ensure the integrity of the tree protection plan is maintained.

LANDSCAPING PLANS

The DEIS fails to specifically outline plans for mitigating the visual impacts of each of the transit stations as well as the large pillars that will support the fixed guide way for the entire length of the project. The Outdoor Circle believes the EIS must be much more specific in its landscaping plans in order to reduce the hard, physical presence of hundreds of support columns in every community along the planned alignment. These plans must include the planting of adequate greenery—trees and/or shrubs—to reduce the substantial visual impacts of the concrete supports.

Equally intrusive and in desperate need of specific landscaping plans are the more than two dozen transit stations that will rise above the fixed guide way and surrounding neighborhoods. These plans must be laid out in the EIS and their costs incorporated into the project budget. Landscaping must be included from the project's initial conception and not as an add-on after the fact.

SIGNS and ADVERTISING

Also not included in the DEIS is any mention of a commitment by the City to reject proposals that would allow signage in, around or on any part of the project—including all “transit oriented development” that may violate existing state or county sign laws. The EIS must address this issue fully. Also, there must be an absolute prohibition against any exterior commercial advertising on the train, the transit stations or any portion of the transit infrastructure such as its maps. The failure to address these concerns is an oversight that must be corrected to ensure that this project will not deviate from the long-standing protection of the visual environment against the scourge of inappropriate off-site advertising or excessive signage.

UTILITY LINES

We believe that this project offers a unique opportunity for the City and County of Honolulu and the wide range of O'ahu's utility providers to remove a long standing and persistent eyesore from the visual environment. One of the most intrusive elements that detract from the beauty of Hawai'i is the overbearing presence of utility poles and lines. The Outdoor Circle believes that relocating all utility lines along the transit route and placing them underground or along the under side of the fixed guide way will enhance the view planes. In addition, committing to this action will provide some mitigation for the visual damage created by the project. The visual burden of the fixed guide way **and** existing overhead utility lines is unacceptable. The EIS should discuss the effects of the utility poles and lines in detail and then provide information on the cumulative impacts of the lines with the fixed guide way.

FINAL OBSERVATIONS

The Outdoor Circle believes the City has substantially downplayed the visual impacts the project will have on our communities and our quality of life. Nor does the city offer acceptable mitigation throughout the DEIS for the damage this project will inflict.

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We believe the city must acknowledge the negative impacts of the largest public works project in Hawai'i history and present sound plans in the EIS to mitigate the damage caused by the project. We strongly urge the City and County of Honolulu to carefully follow federal law in assessing the public's input and respond with changes, alternatives and mitigation that will reduce the long-term social and environmental impacts of the transit project.

In addition, The Outdoor Circle would like to be consulted going forward on the issues delineated in this letter and we would appreciate our organization's involvement being addressed in the document.

Thank you for the opportunity to comment. If you have any questions regarding these comments we would be happy to hear from you.

Sincerely,

Bob Loy
Director of Environmental Programs

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