

Mr. Ted Matley  
FTA Region IX  
201 Mission Street Suite 1650  
San Francisco, CA 94105

Mr. Wayne Yoshioka  
Department of Transportation Service  
City & County of Honolulu  
650 South King Street  
Honolulu, HI 96813

July 18, 2010

Dear Mr. Matley and Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project  
Final Environmental Impact Statement/Additional Comments from AIA Honolulu

I am writing to comment on the two essentially identical letters sent to AIA Honolulu from the Department of Transportation Services (DTS), City and County of Honolulu, on June 11 and June 16, 2010. The responses contained in both these letters are unfortunately very inadequate in addressing the specific issues raised by our organization. We submitted both a letter and a detailed report on December 8, 2008 and February 3, 2009 in response to the Draft Environmental Impact Statement on this project and pursuant to the release of the FEIS.

The comments we recently received in response are very generalized and superficial answers that bear limited relationship to the actual concerns raised. We continue to have serious questions about urban design issues and visual impacts on the surrounding neighborhoods impacted by the proposed transit, and to the lack of adequacy in providing thorough and current analysis and review of identified alternatives.

Below are some key points that have yet to be addressed in an adequate manner:

Mauka to makai views: The FEIS addresses makai and mauka views in a very general sense when in fact existing legislation protects specific mauka to makai views in the Chinatown District due to its historic character, and protects specific views in both directions along certain corridors in the Capital District.

The proposed all-elevated alternative is in violation of Honolulu City & County Land Use Ordinance Chapter 21. In the Chinatown Special District, Section 21-9.60-3 protects prominent makai view corridors at Maunakea Street and Nuuanu Avenue. This visual connection between Honolulu Harbor and the heart of Chinatown reflects the historic ties between the two areas.

In the Capital Special District, Section 21-9.30-3 protects both mauka and makai views along Ala Moana Boulevard between Punchbowl Street and the Capital District boundary, along Mililani Street and Mall between Halekauwila Street and King Street, along Punchbowl Street between Beretania Street and Ala Moana Boulevard and South Street between King and Pohukaina Streets.

The proposed elevated rail system will cross the view planes protected by legislation. The stations, columns, and elevated rail bed will continuously block these views. Issuance of a Record of Decision (ROD) should not be made until such time as identified alternatives have been fully reviewed and analyzed. The all-elevated system proposed in the FEIS is not in compliance with existing law. Placing anything continuously in these view corridors is in violation of Honolulu City & County Ordinances.

AIA Honolulu strongly believes that we must implement a plan that protects the mauka-makai view corridors that are outlined by the City & County of Honolulu in its own Primary Urban Center Development Plan and its Land Use Ordinance.



Section 106 and 4f : The FEIS does not include the Programmatic Agreement to resolve negative impacts to the 33 historic sites impacted by this federal action. The AIA Honolulu has spent many hours as participant in the formal Section 106 consultation process. We have had no communication concerning this agreement since the meetings ended without resolution in October 2009. This is an inadequate action and does not comply with the provisions of the Historic Preservation legislation.

Alternatives Study: The FEIS does not adequately address all alternatives. AIA Honolulu continues to propose a more flexible rail transit system. Light Rail is capable of running at, below or above grade to accommodate the particular conditions in each community. A complete evaluation of this flexible alternative was not undertaken.

Light Rail has been selected in 29 of the last 30 American cities for very good reasons; one of these reasons is the total cost benefit of this energy efficient alternative. The FEIS discussed the benefits in energy savings by using rail rather than cars. However, one must also calculate the energy used to build the system. Our calculations indicate that the “payback” will stretch to over fifty years.

The unsubstantiated statement in the FEIS (page 2-7) that “excavation to a depth of between 4 and 5 feet would be required for the entire length of the at-grade system to construct track, support”—does not take in to account the actual conditions where at-grade is likely to occur and the experience of other cities that have minimized depth disturbance to 19-24 inches.

On page 2-15, the FEIS confuses rail technology terms by creating a new term “Rapid-rail transit (steel wheel on steel rail)”. Both Light Rail and Heavy Rail are “Rapid-rail transit (steel wheel on steel rail)” systems, yet this is not indicated in the analysis or importantly in the City and County decision making. The proposed Alternative is a Heavy Rail (“hot” third rail) system. This is a system without flexibility. Heavy Rail can only occur in an elevated or below grade system for safety reasons.

Light Rail was not adequately considered in the FEIS because evaluation assumptions were made that limited evaluation of possible alternatives. The assumption to maintain the status quo of current traffic patterns, lane requirements, and street parking does not allow consideration of a full range of more environmentally beneficial systems.

AIA Honolulu urges you to withhold a Record of Decision until the FEIS is complete and all alternatives have been adequately addressed. AIA Honolulu encourages the use of social, environment and aesthetic criteria—as well as economic efficiency—in the design of routes and supporting facilities for all transit modes. Transportation system routes and facilities should support land use objectives—including urban growth management and efficient transit mode linkages—and respect significant human, cultural and natural environments. I encourage you to visit the transit page of our web site for additional information on our policies and concerns at [www.aiahonolulu.org/transit](http://www.aiahonolulu.org/transit).

Sincerely yours,



Spencer Leineweber, FAIA  
President-elect, AIA Honolulu  
The Honolulu Chapter, The American Institute of Architects

cc: Council Chair Todd Apo

AIA Honolulu  
119 Merchant Street, Suite 402  
Honolulu, Hawaii 96813-4452  
Phone: 808.545.4242  
Fax: 808.545.4243  
Website: [www.aiahonolulu.org](http://www.aiahonolulu.org)