February 6, 2009

Part II — Insufficient consideration of elevated rail impacts

> *Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment. 40CFR1500.2.*[1]

At the heart of this issue is that of the environmental harm of an elevated rail transit line thirty feet wide at an average of 35 feet elevation accommodating trains every 1½ minutes (three minute intervals in both directions) during the peak commuting time and three minutes at other times traversing the entire center of urban Honolulu including the waterfront.

The effect of elevated rail on the built environment has not been adequately addressed in the Draft EIS. The following requirement that there be discussions about the built environment is not fully addressed.

> *Urban quality … and the design of the built environment including the reuse and conservation potential of various alternatives and mitigation measures.*[2]

Many environmental organizations have gone on record as being opposed to such an elevated structure. The following are some quotes from their recent statements on elevated rail:

> ***Outdoor Circle:*** *The lack of specific descriptions of how to overcome the visual misery that will be heaped upon the O'ahu landscape leaves our organization with little confidence that damages to the visual environment can or will be mitigated as the project moves forward … Of equal concern to The Outdoor Circle is the pending fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It's an important part of Honolulu's appeal to both residents and visitors … The Outdoor Circle believes the City has deceived the public about the visual impacts the project will have on our communities and our quality of life.*
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> ***Historic Hawaii Foundation:*** *The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.*
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> ***Hawaii's Thousand Friends:*** *Elevated fixed rail routes will negatively impact the established landscape of Honolulu and significant view planes makai to mauka …The rail line will be the ugly and block views with concrete rail beds 30-feet wide supported by pillars that are 35-40 feet high and six feet in diameter spaced at 150 feet intervals.*
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> ***Hawaii Architects position****: … the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown ... Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier … We are concerned that the areas below elevated rail structures and stations will become*

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1 http://www.nepa.gov/nepa/regs/ceq/1500.htm §1500.2(f) See also 49 USC 5301(e) and 42 USC § 4321
2 40CFR1502.16(g)

> *blighted, "nuisance" environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.*

We believe that elevated rail violates the Oahu General Plan, which states, in part, we must,

> *Protect Oahu's scenic views, especially those seen from highly developed and heavily traveled areas & Locate roads, highways, and other public facilities and utilities in areas where they will least obstruct important views of the mountains and the sea.*[3]

We believe there has been inadequate consideration of the detrimental effects of elevated rail. What has happened in other communities that once had an El, such as New York's 3rd Avenue El? What are the detrimental impacts of the elevated sections of Miami's Metrorail and San Juan's Tren Urbano? What happened in San Francisco when they removed the Embarcadero Freeway segment?[4]

It should be noted that the Managed Lanes Alternative and the other suggestions for alternatives, the 2003 Bus/Rapid Transit proposal, and the EZWay plan, do not propose any elevated structures through the urban core or in residential areas or along the waterfront. We believe that had these other alternatives been objectively studied as required by NEPA that one of them would have been the "environmentally preferable alternative."

> *The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.*[5]

As was also commented on by the Corps of Engineers:

> *… the overall project purpose is used for evaluating practicable alternatives under the Guidelines, which require that if the overall purpose of a project is practicably met through several alternatives, the Corps can only authorize the least environmentally damaging practicable alternative.*

City renderings misrepresent reality

We asked a professional commercial artist with experience in streetscape renderings to comment on those renderings shown in the Draft EIS on pages 4-65 through 4-84. Following are their comments:

> *In nearly every rendering, the cast shadows have been deemphasized, making the project appear much less impactful. They show shadows, but do not show the correct size and extension to match the existing shadow reach (shown by other objects in the photo), or especially darkness. This has a significant psychological effect, and they use it to the extreme.*
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> *The shadows on the structures themselves have also been deemphasized to give the appearance of blending into the scene, which is also a distortion. They make extensive*

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3 Oahu General Plan, III, Objective B, policies 2 & 3. http://honoluludpp.org/planning/GeneralPlan/GP3.pdf

4 NEPA implementing regulations provide that "[e]nvironmental impact statements shall be concise, clear, and to the point, and shall be *supported* by evidence that agencies have made the necessary environmental analyses" (40 C.F.R. § 1500.2(b)) [emphasis supplied].

5 Council on Environmental Quality's 40 Questions and Answers..http://ceq.hss.doe.gov/nepa/regs/40/1-10.HTM 6(a)

use of a 'white' concrete appearance. Is that a correct material they will use? Even if so, the shadows will be significantly more prominent.

Their choice of view locations/angles is carefully done, of course.

The width of the guideway and its vertical thickness are smaller than what the actual plans call for. Many of the support columns are quite obviously slimmer than they should be.

They are showing support columns on thin grassy strips of median with virtually no 'buffer' between the median curb and the pillar itself. That is not legal.

One of the Dillingham shots (DEIS, fig 4-27) shows a pillar resting directly in the right turn lane. I'm thinking that may be a no-no.

These also do not properly indicate the foliage that will be removed.

The Dillingham shot similar to our rendering talks about trees 'softening' the visual impact, but they don't mention the trees that will be removed on the Mauka side of the street. The angle they use disguises it. The Fort Street Mall shot is a joke. They positioned the shot to put as many trees as possible in the view line.

The photos and renderings on the following pages illustrate our concern with the impacts of elevated rail along the waterfront and through the center of Honolulu:

Our artist carefully calculated the appropriate support column and rail bed widths and added the barriers necessary to protect the support piers. The City's version is below and the differences are obvious; the dimensions are smaller and the structure appears less intrusive. On all City renderings (Draft EIS pp. 4-65 to 4-84), the environmental impacts are deliberately minimized.

Figure 4-28 Viewpoint 12—Dillingham Boulevard near Honolulu Community College and Kapālama Station Area, looking `Ewa

Our artist's rendering of the Varsity Station on University Avenue looking mauka.

Our artists rendering of the sound mitigation panels to be used along Dillingham Blvd.

The City's renderings fail to convey overhead rail's effects on light.

The Aloha Tower station from the City's video of it available on their website.

Photo of straddle bent supports under a New York highway. Notice that in the City rendering below how the sheer ugliness of straddle bent supports is minimized.

Figure 4-36 Viewpoint 20—Mother Waldron Park near Halekauwila Street/Cooke Street Intersection, looking `Ewa