



# SIERRA CLUB

O`ahu Group

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## Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement Comments

Aloha:

Thank you for the opportunity to comment. Sierra Club Oahu Group is in general favor of the proposed transit project, but offers the following questions and comments that we feel would strengthen the EIS and, ultimately, provide a better project for Oahu's citizens.

### Connectivity

The figures in Chapter 2 do a nice job of illustrating station layouts and entry points. The City and County need to provide maps that illustrate how people get to those entrances. These maps should consider a radius of ½-mile from the station. They should clearly indicate sidewalk and

bike lane connectivity to the stations. Infrastructure improvements to provide this connectivity should be part of the project or at the very least a high priority of the City and County. The City and County has a mandate to improve walkability and bikeability in the city. Providing good connections to this transit system would go a long way to achieving that.

Will bikes, surfboards and luggage be allowed on the train? Will there be any restrictions on time of day (i.e. not allowed during commute hours)? What is the size limitation?

What pedestrian and bicycle amenities will be designed and built in or near transit stations?

### **Aesthetics and Viewplanes**

The DEIS provides a thorough discussion on the visual impacts of the project, but provides little in the way of mitigating measures. Many other states utilize attractive concrete art to soften the impact of large highway structures. In addition to softening the visual impact, this strategy also appears to greatly inhibit graffiti. Walls in Arizona and Colorado are effective. In many locales, local artists design motifs that are incorporated in concrete surfaces. See the following link for examples: [http://www.concretenetwork.com/anne\\_balogh/concrete\\_walls.htm](http://www.concretenetwork.com/anne_balogh/concrete_walls.htm)

Why is the entire transit route elevated? Where geography permits, the transit route should be placed at ground level to reduce cost of construction, energy consumption during construction, and impacts to view planes.

### **Agricultural land**

Prime, unique, and statewide important lands are, by definition, of agricultural importance. Land with such classification is significant, not negligible, regardless of acreage. To trivialize the conversion of such lands on the grounds that only a small amount of it will be sacrificed is not acceptable. Conversion of such lands is, according to the ALISH system that defines these classifications, irreversible and therefore not a decision that should be taken lightly or trivialized because of scale.

Once the rail transit route is in place, it is expected that development will occur along the route, and this Transit-Oriented Development will almost certainly affect important agricultural lands. In order for the final EIS for rail transit to accurately and completely examine the environmental impacts to agricultural lands, the project must include agricultural lands adjacent to project construction boundaries. The Final EIS should include a detailed discussion and mitigation plan for negative environmental impacts to agricultural land affected by this project including an analysis of alternative routes to preserve prime, unique, and/or statewide important agricultural land. If these agricultural lands are part of a planned development corridor, the EIS should describe how City and County planning and zoning measures assure that important agricultural lands outside the planned development corridor are preserved.

The transit system should have a terminus in Waipahu, rather than East Kapolei, and extend into Waikīkī and/or up to UH Mānoa instead of extending to East Kapolei where the majority of agricultural lands exist.

**Air Quality**

According to the DEIS, the methodology for projecting future air quality as a result of the various project alternatives is based on anticipated vehicle miles traveled (VMT) and average network speed for each alternative. The data given in the DEIS indicates that all Build Alternatives yield better air quality than the No Build alternative, which may not be true. Better air quality would only occur if the proposed rail transit system replaces enough cars on the road such that its emissions are less than the collective emissions of the cars it replaces. The EIS should discuss the possibility that the offset may not occur, and discuss measures of mitigation.

**Energy**

The Project should make every effort to maximize operating efficiency. The final EIS should also give more consideration as to the feasibility of integrating alternative energy technologies into the project as well as an analysis of potential energy conservation measures such as opting to build sections of the route at ground level rather than elevated where feasible.

What are the plans (if any) to run rail on renewable sources of energy (palm oil not included)?

What assumptions regarding ridership, VMT, etc. were made in determining the energy savings of each Build Alternative relative to the No Build Alternative?

**Errors**

Margins of error for all data, as well as a list of assumptions made, should be provided for clarity.

**Cost**

Will fares be subsidized to encourage ridership? If so, what is the target group for those subsidized fares?

What percent of the cost of rail (construction, maintenance and interest paid on bonds) is expected to be paid with fares? What if fares do not meet this percentage? Will fares and/or taxes be raised? By how much?

Please send comment responses to:

Sierra Club, O`ahu Group  
ATTN: Randy Ching  
1040 Richards St., Room 306  
Honolulu, HI 96813

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Kido". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kim Kido  
*On behalf of the Sierra Club, O`ahu Group*