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Ms. Piilani Kaopuiki, President
League of Women Voters of Honolulu
49 South Hotel Street, Room 314
Honolulu, Hawaii 96813

Dear Ms. Kaopuiki:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address comments regarding the above-referenced submittal:

Process

The Draft EIS was available for public review at local libraries and City offices. It was provided for free on disk, by request, to assist users in searching the document. Bound copies were provided at reproduction cost to anyone who requested one from the City. The use of 11-by-17 inch pages and color in the document allowed maps to be reproduced at a readable

resolution and photographs and other figures to convey information about the Project and its impacts. The Final EIS is being widely distributed in an easy-to-use format to maximize public review and to allow the public to understand its contents.

Chapter 1—Background, Purpose and Need

The EIS uses the socio-economic data that was available from OahuMPO at the time that the EIS work began, based on DBEDT's "Population and Economic Projections for the State of Hawaii to 2030" prepared in August 2004. The 2030 forecast year used in the EIS is consistent with FTA's guidance for New Starts projects.

As the comment notes, DBEDT has prepared new forecasts at the County level, "Population and Economic Projections for the State of Hawaii to 2035" issued in January 2008. For use in travel forecasting, these County-level forecasts must be disaggregated to the level of "Travel Analysis Zones" of which there are 764 on Oahu. At the time of the publication of the Draft EIS, these zonal-level forecasts had not been prepared and accepted by OahuMPO.

Your comment notes that the January 2008 DBEDT forecasts have lower population projected than the August 2004 forecasts. Specifically, the January 2008 population forecast for Oahu for 2030 is 3.3 percent lower than the August 2004 forecast. However, the 2030 employment forecast for Oahu from the January 2008 forecasts is 5.8 percent higher than the August 2004 forecast. Thus, it is not clear what the effect on ridership projections would be of using the January 2008 forecast, since the higher employment forecast would likely result in more work trips, which are attractively served by transit, while the lower population forecast would likely result in fewer trips for other purposes.

The financial information contained in Chapter 6 of the Final EIS recognizes the change in economic conditions since the Draft EIS was issued and reflects reduced General Excise and Use Tax (GET) surcharge collections and lower costs of some materials. Since economic conditions are continually changing and a snapshot in time will only be valid for that time, the financial plan for the Project is a dynamic document and will be updated periodically to reflect the latest conditions as the Project continues. The plan assumes there will be ups and downs in the economy and is designed as a long-term strategic document that will weather short-term trends. Moreover, the financial plan is reviewed by the FTA under strict guidelines to ensure forecasts of costs and revenues (both capital and operating) are reasonable and that the plan is fiscally viable. Section 6.6 of the Final EIS describes risks and uncertainties associated with the funding assumptions.

Chapter 2—Alternatives Considered

In "Chapter 2—Alternatives Considered" of the Alternatives Analysis Report (DTS 2006b), as well as in "Chapter 2, Alternatives Considered," of the Final EIS, two options were considered for the Managed Lane Alternative—Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs). The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it might be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: "The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have slightly reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Option compared to the No Build Alternative, indicating an increase in system-wide congestion" (see Table 2-2 of the Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for transit-oriented development (TOD). The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the Transportation System Management (TSM) Alternative, the Managed Lane Alternative would not have substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would pay for ongoing operations and maintenance while remaining revenues would be used to repay debt incurred to construct the system.

The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation use, and would have resulted in the largest number of transportation noise impacts of all the alternatives evaluated. Because the Managed Lane Alternative would have served a shorter portion of the study corridor (approximately 16 miles compared to the 20 miles served by the fixed guideway), it would have resulted in fewer displacements and would have impacted fewer archaeological, cultural, and historic resources than the Fixed Guideway Alternative. The Managed Lane Alternative would not have affected any farmlands. Visually, the elevated structure would have extended a shorter distance, but it would have been more visually intrusive because its elevated structure, with a typical width of between 36 and 46 feet, would have been much wider than the Fixed Guideway Alternative.

As stated in Chapter 2 of the Final EIS, as well as in Chapter 2 of the Alternative Analysis Report, the total capital costs for the Managed Lane Alternative would range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. As stated in the City's Transit Task Force Report, a committee was charged with reviewing cost estimates for the two Alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative). The report states that "the Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons." Information was obtained by the Task Force from the Hawaii Department of Transportation and others familiar with high-occupancy toll (HOT) facilities. The transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that

would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility.

By contrast, as noted in Chapter 6, Cost and Financial Analysis, of the Final EIS, the capital cost of the Fixed Guideway Alternative, including bus system costs, would be $4.6 billion in 2009 dollars or $5.5 billion in year-of-expenditure dollars. Total operating and maintenance costs for the Fixed Guideway Alternative, including bus, TheHandi-Van and fixed guideway, would be approximately $489 million in inflated dollars.

After the Alternatives Analysis phase was completed, several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and rejected during the Alternatives Analysis. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration.

The Fixed Guideway Alternative would be more cost-effective in the long run. As stated in Chapter 6 of the Final EIS, funding sources for the capital investments include a GET surcharge, City general obligation bonds, and FTA funds. Only the Fixed Guideway Alternative could be funded with the GET surcharge. GET is expected to generate $3.5 billion through 2022, and the FTA has agreed to consider at least $1.4 billion as a Federal contribution to the Project under the New Starts program. No funding sources were identified for the Managed Lane Alternative Toll revenues from the Managed Lanes Alternative would pay for ongoing operations and maintenance. Any remaining toll revenues would be used to repay debt incurred to construct the system, but other undefined sources of funding would be needed to pay for construction.

As described in Chapter 2 of the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable property. No location has been identified closer to Downtown with sufficient available property to construct a maintenance and storage facility. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*
- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and resources.*
- *Balance expenditure of funds to minimize borrowing.*

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Right-of-way can be obtained more quickly; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center. All transit systems have been connected to a maintenance site prior to operation.

Appendix B of the Final EIS includes detailed project plans and a system profile. The Ala Moana Center Station platform will have an elevation of approximately 35 feet above the existing ground. The stations will have restrooms accessible to the public, but individuals will be required to obtain access to these facilities from the station attendant. In the Draft EIS, the terms mezzanine and concourse were used interchangeably. For the Final EIS, the term concourse is used for ease of reference and to cut down on any potential confusion.

Chapter 4—Environmental Analysis, Consequences, and Mitigation
Environmental Justice Sections 4.7.5 and 4.7.6, Banana Patch Community and Mitigation

Regarding Banana Patch, the Final EIS has been revised to reflect public outreach coordination with this community during the Draft EIS comment period. As discussed in Section 4.7.4, Environmental Justice Determination, the City has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by City staff, right-of-way staff, and engineering staff to discuss the Project, as well as special needs and relocation assistance for residents who will be displaced. Strategic outreach was conducted for this neighborhood, and it was found the residents were mostly interested in learning more about the right-of-way acquisition process. Residents asked when acquisition might occur, how their property would be appraised, and how soon they might receive compensation. Residents of the community did not object to being relocated to decent, safe, and sanitary housing in compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. Nor was there concern expressed about keeping the community intact for relocation purposes. Because the Pearl Highlands Station will displace this community, the location of the station and associated facilities was examined under the USDOT Order on Environmental Justice (Order 5610.2). First, the need for the station was examined. Analysis showed that this station is projected to have the second highest passenger volume of all of the project stations. It will serve as the transfer point for all users in Central Oahu, whether they drive or take TheBus. As such, there is substantial need for the Pearl Highlands Station.

Secondly, two alternatives to the guideway and highway ramp alignments, station locations, and park-and-ride locations for the station were evaluated to access feasibility. One alternative would move the park-and-ride to Leeward Community College. This modification would require a number of changes. The net increase in cost for this alternative would be approximately $90 million. The second alterative considered moving the park-and-ride to the Hawaii Laborers Training program site. This change would prevent the placement of a track switch to access the maintenance and storage facility site near Leeward Community College in the Koko Head direction, which would make this maintenance and storage facility site impractical. The net increase in cost for this alternative would be more than $63 million.

In conclusion, relocating the park-and-ride facilities under either of the two alternatives would provide less efficient transportation access and circulation to the park-and-ride. Moreover, displaced residents of the Banana Patch community did not voice opposition to the Project, did not express concern about the adverse effects, and appeared satisfied with mitigation measures with regard to relocation. As such, the Project will not result in disproportionately high or adverse impacts to the Banana Patch community.

Where relocations will occur, compensation will be provided to affected property owners in compliance with all applicable Federal and State laws and would follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The following measures will be implemented for relocations:

- *The City will assist all affected persons in locating suitable replacement housing or businesses within an individual's financial means.*
- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*
- *Relocation services will be provided to all affected businesses and residential property owners and tenants without discrimination; persons, businesses or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

Visual and Aesthetic Conditions Section 4.8

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Final EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following measures will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with the City's TOD program within the Department of Planning and Permitting.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*

It should also be noted that the Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS under the heading Design Principals and Mitigation, specific environmental, architecture, and landscape design criteria are listed that will help minimize visual effects of the Project.

As stated in Section 4.8.3 of the Final EIS, "The station and the guideway will be located between the Ala Moana Center and mid- to high-rise buildings and will not substantially change the view from adjacent offices and residences." DTS considered your request for additional visual simulations at the Ala Moana Center; however, the existing simulations previously presented in the Draft EIS adequately represent the Project's visual impacts in that area. The Project has logical termini at East Kapolei and Ala Moana Center and independent utility from any extensions that may be constructed in the future. The future extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. However, the future extensions are not part of this Project; thus, they are not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and NEPA. Under NEPA, environmental analysis is only required when there is a proposed action by a Federal agency. Here, because the future extensions are not proposed for implementation at this time, they are not part of the Project studied in the Final EIS. It would be premature to undertake an environmental analysis of the extensions (beyond the cumulative impacts analysis) because they are not part of the proposed action to be taken by the City and FTA. If the extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time.

The actual dimensions of each station will be determined during the final design phase, but they will generally be about 30 feet above the ground unless special conditions prevail. The simulations included as figures in Section 4.8 of the Final EIS represent the range of scale and spatial relationships of project elements to surrounding land uses and structures, so that the visual effects of the Project can be determined. The visual effects of the Project are documented in this section of the Final EIS.

Chapter 6—Cost and Financial Analysis

The capital plan for the Project is presented in Section 6.3 of the Final EIS, including a description of the amount of funding anticipated from various sources. This financial plan and analysis takes the current economic downturn into account. Section 6.6 of the Final EIS describes risks and uncertainties associated with these funding assumptions.

A Queen Street alignment was evaluated at two stages in the Alternatives Analysis process. This alignment had significant visual impacts, impacts on historic properties, impacts on street traffic patterns, and severe engineering constraints and was not brought forward into the Draft EIS for these reasons.

As stated in Chapter 6 of the Alternatives Screening Memorandum, an alignment along Queen Street, rather than Halekauwila Street, had been proposed for screening. Following initial scoping of the alternatives and further engineering analysis, however, it was determined that the

Queen Street alignment might not prove to be feasible. As noted in the Alternatives Screening Memo (page 6-3), "The elevated alignment [along Queen Street] would have to pass very near high-rise buildings in some locations. Locating stations within the physical constraints of this alignment is a particular challenge."

Both the Queen Street and the Halekauwila Street alignments were advanced to the Alternatives Analysis. The Queen Street alignment would have direct, significant impacts on a number of historical resources. The Queen Street alignment would also have significant visual impacts on an historic area of Downtown. As noted in the Alternatives Analysis (Pages 6-4 and 6-5), "The Queen Street alignment would have somewhat greater negative visual impact because the narrow available right-of-way would require a stacked alignment in the Downtown area and because it would cross between Hale Auhau and the rest of the Hawaii Capital Historic District. The Nimitz Highway/Halekauwila Street/Kapiolani Boulevard alignment would be the best alignment option within Section V." As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS, and no cost estimate was prepared. Contingency amounts estimated for the capital cost of the Project are intended to account for additional costs that are currently unknown but which are reasonably expected to occur. In the event of an economic recession, it is likely that construction costs will decline, or at least will not escalate at as high a rate as would be the case in the absence of a recession. Thus, contingency amounts estimated for the Project could be larger than needed. As discussed above, the financial plan is a dynamic document that will be revisited to respond to changing conditions. FTA reviews the estimate regularly using third party specialists and has found the cost estimate to be sound.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions and will conclude the environmental review process for this Project.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure