

Department of the Navy, Navy Region Hawaii
850 Ticonderoga Street, Suite 110
Pearl Harbor, HI 96860-5101

Dear Mr. Muilenburg:

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.

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Preferred Alternative (23 C.F.R. § 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:

The Navy's eligibility determinations remain valid. The properties in question, including the 499 acres at Barbers Point, are outside the boundaries of the Project covered in the Draft

EIS, and the FTA makes no eligibility determinations for them. No eligibility determinations for

the properties in question were submitted the State Historic Preservation Division (SHPD) for

concurrence, and SHPD's concurrence letter does not discuss these properties. Section 106

consultation letters are presented in Appendix G, Record of Public and Stakeholder Correspondence and Coordination, of this Final EIS.

Section 106 consultation did not include eligibility determinations for the properties in question. Neither the eligibility determinations in the Honolulu High-capacity Transit Corridor

Project Historic Resources Technical Report (RTD 2008o) nor the Historic Effects Report (April

2009) include the properties in question. These reports are available from the Department of

Transportation Services and on the project website (www.honolulustransit.org).

Jeff Neely
U.S. General Services Administration
450 Golden Gate Avenue (9P)
San Francisco, CA 94012

Dear Mr. Neely

Subject: Honolulu High-Capacity Transit Corridor Project
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the Draft EIS. The following paragraphs address comments regarding the above-referenced

submittal:

Since the publication of the Draft EIS, DTS has coordinated directly with GSA on safety and security concerns at the Federal Courthouse building. GSA has provided documents allowing a more comprehensive determination of security needs. The Project's Safety and

Security experts will continue to work with GSA staff on security concerns. Project staff have

been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly

with the GSA to safeguard the Department of Justice and other federal staff. We are confident

that we can adequately address your concerns without moving the proposed alignment. Section

2.5.4, *Safety and Security Measures*, of this Final EIS contains additional details on security measures being incorporated into the project.

American Institute of Architects, Honolulu Chapter
119 Merchant Street, Suite 402
Honolulu, HI 96813

Dear Mr. Char:

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Comments Received on the Draft Environmental Impact Statement

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the Draft EIS. The following paragraphs address comments regarding the above-referenced

submittal:

The island's unique visual character and scenic beauty was considered in the visual and aesthetic assessment presented in the Draft and Final EISs. It is acknowledged that the

guideway and stations will noticeably contrast with Chinatown's historic character. In addition,

views in Downtown and the other areas, including protected mauka-makai views, will be blocked

and some views will change, resulting in substantial visual effects. Section 4.8 of the Final EIS

further assesses protected mauka-makai views from what was presented in the Draft EIS (see Tables 4-10 through 4-14 and Figures 4-39 through 4-50). The assessment acknowledges that some view obstructions and changes to views will be unavoidable and substantial. They will be most noticeable where the guideway and stations are nearby or in the foreground of views. This includes views for those who travel near the alignment. The degree of visual effect will vary with the alignment orientation, guideway and station height, and height of surrounding buildings and trees, along with the viewer's expectations of view quality. It is also noted that the Project will conflict with Revised Ordinance of Honolulu (ROH) Section 24-1.4 where project as the guideway, will block protected mauka-makai view corridors. View changes are not likely to be obtrusive in wider vistas or regional panoramic views where the project elements serve as smaller components of the larger landscape. Section 4.8.3 of the Final EIS includes more detail on measures to minimize negative visual effects. The Project will have a positive effect on community, social, economic, and natural resources in a number of ways. With a net reduction of more than 40,000 cars a day taken off Oahu's crowded highways, the Project will provide a transportation benefit to the community as a whole—even to those who never use the system. The high-quality transit access will serve major transit-dependent communities in Honolulu linking jobs with affordable housing and will help focus future growth into existing and planned urban areas. The City is working with

communities to plan the areas around stations to attract high quality mixed-use development that will create opportunities for affordable housing and accessible jobs in an environment well suited to walking, bicycling, and transit use. This will expand economic and social opportunities to those without access to a car and allow families to save money otherwise budgeted for transportation.

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, Waikīkī, and UH Mānoa 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 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 future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. In response to your second comment, Section 4.6.3 of the Final EIS describes potential safety

and security issues once the Project is operating. The discussion notes that to reduce the potential for crime, the FTA requires the development and implementation of a Safety and Security Management Plan (SSMP) for new fixed guideway projects (49 CMR 633). The SSMP will address the technical and management strategies for analyzing safety or determining security risks throughout the Project's life cycle. In addition, DTS has developed specifications and Design Criteria to address the City and County of Honolulu's requirements for the Project. Chapter 25 of the Design Criteria is dedicated to the safety and security of the system. The Alternatives Screening Memorandum recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 different combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown Honolulu were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street. The Alternatives Analysis Report evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The

alignment with at-grade operation Downtown and a tunnel through the Capital Historic District,

in addition to the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections,

would cost more than \$300 million more than the least expensive alternative.

The Project's purpose is "to provide high-capacity rapid transit" in the congested eastwest travel corridor. The need for the Project includes improving corridor mobility and reliability.

The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

System Capacity, Speed, and Reliability*—the short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Under ideal circumstances, the capacity of an at-grade system could reach 6,000 passengers per hour per direction. Based on forecasts, the Project will need to carry more than 9,000 passengers by the early 2020s. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority,*

the at-grade speeds would be slower and less reliable than an elevated guideway. An at-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals) along with other vehicles, and potential conflicts with other at-grade activity, such as cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic, or the need to let cross traffic proceed at intersections.

Mixed-Traffic Conflicts—*with the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds. An at-grade system would also require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion for those who choose to drive. Congestion would not be isolated to the streets that cross the at-grade alignment but instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal, and in fact will reduce systemwide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). That is because the elevated guideway will require no removal of existing travel lanes, while providing an attractive, transit will continue to operate without delay or interruption.*

The at-grade light rail, with its continuous tracks in-street, will create major impediments

to turning movements, many of which would have to be closed to eliminate a serious crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience significant collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections), there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This potential would be especially high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is very high and the aging population presents a particular risk.

Construction Impacts—*constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an atgrade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because*

of differing construction techniques, more lanes would need to be continuously closed for atgrade

construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access.

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system

would have a negative system-wide impact that would reduce ridership throughout the system.

The at-grade system would not meet the Project's Purpose and Need and, therefore, does not require additional analysis.

The resources and costs associated with construction and operation of an elevated system have been considered in project planning. As evaluated in the Alternatives Analysis, an

underground system would be the least cost-effective option. An at-grade system in the downtown area would not meet project requirements for rapid, safe, and reliable operations.

The system will be constructed and operated in a sustainable manner using best practices and

will result in a reduction in total energy demand on the island.

In response to your final comment, the Project's chosen technology ensures speed, reliability and efficiency and is the only one that allows an automated, driverless system.

As such, it will

have a lower operating cost and attract the highest ridership of all technologies examined. As

discussed previously, at-grade operation would require a fenced right-of-way with no crossings,

which is not possible to construct in the Downtown area.

Lawrence T. Yamamoto

U.S. Department of Agriculture, Natural Resources Conservation Service

P.O. Box 50004

Honolulu, HI 96850

Dear Mr. Yamamoto:

Subject: Honolulu High-Capacity Transit Corridor Project

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the Draft EIS. The following paragraphs address comments regarding the above-referenced

submittal:

Coordination regarding the Farmland Protection Policy Act has been ongoing between the City and NRCS. This coordination includes two submittals of the Form NRCS-CPA-106 with

a request for NRCS to complete the corridor assessment scoring portion of the form.

Only one

corridor was evaluated in the Form NRCS-CPA-106 as only one alignment through farmlands

were evaluated in the Draft and Final EISs. As defined in 7 CFR 658.4(c)(2), "Sites receiving a

total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated." The Project was given a Farmland Conversion Impact

Rating Score of 120. On April 24, 2009 this final form was sent to you. Therefore no further

action is necessary for the Project regarding its compliance with the Farmland Protection Policy

Act.

The two proposed alignments in the Draft EIS for the rapid transit route extend over 20 miles across southern Oahu. All of the crossings of named streams along this route were

evaluated to determine whether the water bodies were navigable waters, waters of the U.S., or not waters of the U.S. Field investigations for waters of the U.S. were conducted along the project's alignment from December 2007 through January 2008 and from January 2009 through July 2009. Thirty-one sites were studied that were either streams or areas where there was the potential for wetlands. The results of this study are documented in the Wetland and Waters of U.S. Study (RTD2009b).

The methods used to evaluate potential wetlands along the project alignment followed the Wetlands Delineation Manual (USACE 2987). The NRCS Soil Survey of Oahu, Hawaii was

one of the sources of information used to determine the presence of hydric soils. In addition, maps of wetland sites were also examined. There are three information sources for wetland sites:

- The USFWS 1970 wetlands map, which catalogues known wetlands and open water surfaces from aerial surveys. Many open water bodies (such as those on the 'Ewa Plain near the rapid transit route) were previous irrigation impoundments that have long been removed.*
- The Geographic Approach to Planning (GAP) maps, which only covers bird habitats in the Pearl Harbor area.*
- The Hawaii Wetlands Joint Venture, which provides a point location (not an area) as a wetland identifier*

DTS has coordinated with the USACE throughout this study and will continue coordination as part of the Section 404 permitting process. The results of the analysis demonstrate that the project will not impact wetlands. Sections 4.14.2 and 4.14.3 in this Final

EIS document this effort.

Michael D. Larson, Property Manager
U.S. General Services Administration, Public Buildings Service
Prince Kuhio Federal Building & U.S. Courthouse
300 Ala Moana Boulevard, Suite I-336
Honolulu, HI 06850-4992

Dear Mr. Larson,

Subject: Honolulu High-Capacity Transit Corridor Project
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The General Service Administration (GSA) did not receive a scoping notice for the March and April 2007 NEPA scoping period, nor an invitation to be a participating agency because, at that time, the need for use of federal land at the PJKK Federal Building had not

been identified. Nor was any other required permit or approval from the GSA identified.

The

GSA will receive all relevant notices and documents regarding the Project in the future.

The

DTS met with the GSA and court staff to determine courthouse security requirements and

address security concerns on October 16 and November 10, 2008, and on February 3 and

March 31, 2009. In addition, DTS staff will continue to work with the GSA to address safety and

security concerns associated with location of the alignment near the PJKK Federal Building.

DTS will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other

federal staff.

An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. This alignment had significant visual impacts, impacts on historic

properties, evidence of burials within the vicinity of Queen Street near Kawaiahao Church,

impacts on street traffic patterns, and severe engineering constraints, and was not brought

forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo

(Chapter 6), 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. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (pages 6-4 to 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." The Capital Historic District is not affected by the Halekauwila alignment.

As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

Section 4.10.3 of the Final EIS discusses noise and vibration impacts. This analysis concludes that there will not be any moderate or significant noise and vibration impacts on the PJKK Federal Building as a result of the Project. The Project will include an integrated parapet wall at the edge of the guideway structure that extends 3 feet above the top of rail. The parapet wall will substantially reduce ground-level noise. Wheel skirts will increase the benefit from the parapet wall at locations above the elevation of the track. Once the Project is operating, noise levels will be remeasured to confirm that there are no noise impacts from the Project.

R.W. Kitchens, Commanding Officer
Department of the Navy
850 Ticonderoga Street, Suite 100
Pearl Harbor, HI 96860-5102

Dear Mr. Kitchens:

Subject: Honolulu High-Capacity Transit Corridor Project

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the Draft EIS. The following paragraphs address comments regarding the above-referenced

submittal:

Cover Letter

The Navy has been provided a map of areas required for the Project. Property for the Pearl Harbor Station will be needed in the vicinity of the Little Makalapa Housing Area, and a

small portion of Hickam Air Force Base property will be needed in the vicinity of Nimitz Field for

the guideway. DTS has coordinated with the Navy throughout the development of the Project.

General Comments/Concerns:

1) Navy and Air Force land acquisition: As described above, the Navy has been provided a map of areas required for the Project. Coordination with the Navy for use of Navy

lands is ongoing. The most recent information regarding station design and right-of-way needs

was presented to the Navy on June 12, 2009.

2) Impacts to Navy utilities: As presented in Section 4.18.2 of this Final EIS, "Design criteria will govern all new utility construction outside of buildings, as well as the support, maintenance, relocation, and restoration of utilities encountered or affected by project construction." In addition, coordination will occur with property owners on factors including, but

not limited to, underground utility service connections, access or driveway reconstruction, utility

disruption, water service, grounding work, demolition, landscape protection, landscape

restoration, fencing, mail delivery, and garbage collection. This will include notifying and working with the Navy regarding non-state roadways and roadway rights-of-way on Navy property.

3) Impacts to Navy roadways and traffic patterns adjacent to Navy property: There will be no substantial additional wear and tear on Navy roadways as a result of commuter traffic to

fixed guideway stations or park-and-ride lots. Any wear and tear resulting from construction will

be repaired by the contractor upon completion of construction.

As shown in Table 5-40 in Addendum 02 to the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report (DTS 2009i), the analysis of the effect of the park-and-ride

trips to the Aloha Stadium Station was conducted at nine intersections adjacent to the proposed station. The access to and from Ford Island to the proposed park-and-ride station

would be via the intersections of Kamehameha Highway at Salt Lake Boulevard (makai bound)

and Kamehameha Highway at Ford Island Boulevard at Admiral Clarey Bridge/Salt Lake Boulevard (mauka bound). The analysis indicated that neither of these two intersections near

the Aloha Stadium Station park-and-ride will experience an increase in delay compared to No

Build Alternative.

4) Noise impacts to Navy housing areas: Additional noise measurement sites have been added between Aloha Stadium and Hickam Air Force base based on Navy concerns.

The

Project noise levels in this area have been added to Section 4.10 of the Final EIS. As discussed

in this section, the noise monitoring was conducted at Betlo Place, Makalapa Guest House,

Makalapa Drive, Community Center, and MWR Youth Field for the Final EIS. Moderate noise

impacts will occur at Makalapa Guest House and Belto Place. However, the Project will include

an integrated parapet wall at the edge of the guideway structure that extends 3 feet above the

top of rail. The parapet wall will substantially reduce ground-level noise. Wheel skirts will

increase the benefit from the parapet wall at locations above the elevation of the track.

As a

result the Project will cause no noise impacts in this area. Once the Project is operating, noise

levels will be remeasured to confirm that there are no noise impacts from the Project.

5) Construction impacts: As the Project proceeds to construction in the vicinity of Navy and Air Force facilities, the DTS will coordinate construction timing. The selected construction

contractor will be required to keep the Navy and other neighbors informed of upcoming activities.

6) Impacts to Navy permits: As detailed in Section 4.14 of the Final EIS, the fixed guideway will not generate water pollution nor will it add to impervious surface. In the vicinity of

Pearl Harbor, it will run above a currently paved area. DTS will continue to work with the Navy

so that the Project will not impair Navy permit conditions.

housing/parking impacts: DTS is coordinating with the Navy regarding base security concerns.

Section 2.5.4 of the Final EIS provides an overview of Safety and Security features of the

Project. Specific security concerns have been addressed with the Navy through intergovernmental

coordination beginning with the April 17, 2009 meeting. Appendix B, Preliminary Alignment Plans and Profiles, of this Final EIS includes the location and height of the system

and stations.

The park-and-ride lot at Aloha Stadium will be located closer to a station than any of the listed areas above; therefore, users are likely to use the authorized parking at that location.

Nonetheless, DTS has committed in the Final EIS to work with local property owners around

stations to develop measures to limit the effects of potential spillover parking. As stated in

Section 3.4.6 of the Final EIS, the approach to mitigating the effects of spillover parking parking will be unique to each station area. The City will conduct surveys to determine the

extent of spillover parking demand near stations and implement one or more mitigation strategies as needed. Strategies include, but are not limited to, addition of parking supply,

parking restrictions, parking regulations, permit parking, and/or shared parking arrangements.

The specific mitigation strategies and the schedule for implementation will be determined as

stations are opened. Parking surveys will be conducted prior to starting construction of a station, and again within six months after opening of the station.

Increased pedestrian traffic near Aloha Stadium station will primarily consist of residents accessing nearby residential communities and people walking to/from the stadium during events. In addition, some Arizona Memorial visitors will likely walk from the Aloha Stadium

station along Kamehameha Highway (about a 10-minute walk) to reach the memorial.

The

primary users of the Pearl Harbor Navy Base station will Base workers and some nearby residents or visitors. After getting off the station, most pedestrians will walk directly to the Base.

8) Integration of public transportation with transit corridor stations: Chapter 3 in the Final EIS states: "The bus network will also be restructured to provide access from surrounding

communities to the fixed guideway with more frequent bus service. Bus routes serving guideway stations will typically be shorter and will operate in less congested residential communities. These operations will help maintain service reliability compared to operations of

longer-distance routes."

The restructured bus network serving the stations includes connections to the major

employment centers on Oahu, including Pearl Harbor Naval Base and Hickam Air Force Base.

These locations are currently served by TheBus routes and are frequently delayed due to traffic

conditions outside of the military facilities. With the Project, these two employment areas will be

served with all-day shuttles connected to the guideway. The Pearl Harbor shuttle (Route 312)

is planned to provide 8-minute service in the peak hour with 30-minute mid-day frequency

directly serving Pearl Harbor from the Aloha Stadium Station and Transit Center. The Hickam

Air Force Base shuttle (Route 313) is planned to provide 15-minute service in the peak hour

with 30-minute mid-day service. Future transit routes and frequencies are shown in a table and

series of maps in Appendix D, Bus Transit Routes, of the Final EIS.

Other planned service improvements include:

1. Reconfigured Route 314 will provide service to the entire island.
2. Reconfigured Route 312 will operate via Aloha Stadium Station to EB Kamehameha, right on Arizona to serve Pearl Harbor via Halawa Gate. The route will continue left on Neches, right on North Road, left on Kuahua, right on Jarvis, right on Northampton to Simms, right on Vincennes serving the Fleet and Industrial Supply Center. The route will continue along its current alignment and would enter/exit Pearl Harbor via Halawa Gate.
3. The Fleet and Industrial Supply Center will be served as described above.
4. Kuahua Avenue will be served as described above.

5. Although South Avenue will not be directly served under this plan, many of the buildings

along South Avenue are served by Route 312 operating along Central Avenue.

6. New Route 315 will provide peak period weekday service to the office buildings in Makalapa Crater. The route will operate via Aloha Stadium to EB Kamehameha, left on Halawa Drive to Luapele Drive with a turnaround. Route 315 is approximately 1.35 miles roundtrip from Aloha Stadium Station and will offer 4 AM and 4 PM peak period trips.

Shuttle service frequencies will be adjusted based upon passenger demand experience as the

guideway is developed. Guideway connections for military residential and shopping areas have

been designed based upon the same travel demand and access information as other areas on

Oahu.

All of the transit centers (Aloha Stadium, Pearl Highlands, West Loch, and University of Hawaii at West Oahu) serving the guideway are being planned with space for bus shuttles not

operated by the City, including the military's bus service, to pick up and drop off passengers.

The Final EIS includes information about changes to the public transit system to accommodate the fixed guideway operations in Appendix D.

9) Hazardous waste and materials and Installation Restoration (IR) sites: The Project will not affect the golf course site. No Navy property between Elliot Street and Moanalua

Stream will be affected. This is shown in Appendix C, Preliminary Right-of-Way Plans, of the Final EIS. The individual issues in this comment are addressed to the “Specific Comments”

section below. No impact to Navy hazardous materials/waste facilities are anticipated.

10) Potential Impacts to Navy fuel distribution system: DTS is coordinating with the Navy to ensure that the Navy fuel distribution system will not be affected by the Project.

11) Impacts to Archaeological, Cultural, and Historic Properties: DTS has consulted with the Navy and the Navy was invited to participate as a signatory on the Programmatic

Agreement for the Project.

1) Section 4.5 Neighborhoods: The section discussing Aliamanu-Salt Lake Boulevard has been removed from the Final EIS. The selection of the Airport Alternative as the Preferred

Alternative was made by the City to comply with FTA’s NEPA regulations that state that the

Final EIS should focus on the Preferred Alternative (23 C.F.R. § 771.125 (a)(1)). As stated

previously, DTS does not anticipate substantial increased traffic by persons not affiliated with

the Navy on Navy streets as a result of the Project.

2) Section 4.11 Hazardous Waste and Materials

a) In response to your comment, the second paragraph of Section 4.11.1 of the Draft EIS has been modified in Section 4.12.1 of this Final EIS to read “Hazardous waste in the City is primarily regulated by the Solid and Hazardous Waste Branch of the HDOH. The Solid and Hazardous Waste Branch is responsible for overseeing the Office of Solid Waste Management, the Underground Storage Tank Program, and the Hazardous Waste Program. The HDOH Office of Hazard Evaluation and Emergency Response is responsible for implementing the Hawaii Environmental Response Law (HRS

128D), the State Contingency Plan (HAR 11-451), and the Hawaii Emergency Planning and

Community Right-to-Know Act (HRS 128E).”

b) In response to your comment, the name of the National Priority List site has been changed to read Pearl Harbor Naval Complex in Section 4.12.2 of this Final EIS.

c) In response to your comment, the bullet has been changed in Section 4.12.2 of the Final EIS to read “Former Naval Air Station Barbers Point—portions of which are still under the jurisdiction of the Navy, while other portions are now under the Hawai’i Community Development Agency’s jurisdiction.”

d) In response to your comment, the bullet has been changed to read “Pearl Harbor Naval Complex—an active Navy base on the National Priority List (Superfund); the complex formerly included in the Navy Drum site.” Because this site has a history of being referred to as the “Navy Drum” site, we will continue to use this term instead of the official IR name. The closure of the site is discussed in Section 4.12.2 of the Final EIS.

e) The Pearl Harbor Naval Station was given a “1” rank not because of its current use and condition but based on past petroleum and chemical releases. We understand that many of those releases have been appropriately addressed. The 1 ranking indicates further assessment is warranted prior to construction of the Project.

f) In response to your comment, the last sentence has been modified to read “The U.S. Department of Health & Human Services and Hawaii DOH reviewed the study, concur with the findings, and consider the case closed.”

g) *The interior passenger area of the transit vehicles will use fluorescent light bulbs. Fluorescent light bulbs would also likely be used in station areas and other Project h i - iii) The information provided is noted. This has been reviewed during planning and design efforts to address potential contaminated soil and groundwater in these areas.*

3) *Section 4.15 Archaeological, Cultural, and Historic Resources*

a) *The Navy has been included as a Section 106 consulting party. All Section 106 documentation has been transmitted to the Navy for review and comment. The Honolulu High-Capacity Transit Corridor Project Historic Effects Report (DTS 2009d) was provided to the Navy on April 17, 2009.*

b-c) *The Navy was consulted in the effects determination for historic properties.*

U.S. District Court, District of Hawaii
300 Ala Moana Boulevard, C-400
Honolulu, HI 96850-0400

Dear Ms. Gillmor:

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

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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 should focus on the

Preferred Alternative (23 C.F.R. § 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:

Since the publication of the Draft EIS, DTS has coordinated directly with GSA on safety and security concerns at the Federal Courthouse building. GSA has provided documents allowing a more comprehensive determination of security needs. The Project's Safety and

Security experts will continue to work with GSA staff on security concerns. Project staff have

been working with property management staff from the GSA. We will commit to meet all applicable setback requirements in addition to other security measures as discussed directly with the GSA to safeguard the Department of Justice and other federal staff. DTS met with representatives of the court and GSA on October 16 and November 10, 2008, and on February 3 and March 31, 2009. A threat and vulnerability assessment was developed for the Federal Building, including the Federal Courthouse. The assessment was provided to GSA. An alignment that avoided Halekauwila Street was evaluated at two stages of the Alternatives Analysis process. A Queen Street alignment had significant visual impacts, Church, impacts on street traffic patterns, and severe engineering constraints, and was not brought forward into the Draft EIS for these reasons. As stated in the Alternatives Screening Memo (Chapter 6), 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. While the Halekauwila Street alignment was acknowledged to have the potential for visual impacts on the Aloha Tower, this impact was evaluated in the context of the fact that the Queen Street alignment would have the same impact to Aloha Tower and would have impacts on a number of historical resources. The Queen Street alignment would have significant visual impacts. As noted in the Alternatives Analysis (pages 6-4 to 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." The Capital Historic District is not affected by the Halekauwila alignment. As a result, the Queen Street alignment did not advance from the Alternatives Analysis to the Draft EIS.

The City Council received the letter provided by the courts. It was forwarded to RTD for response in the Final EIS.

Queen Street, King Street, and Beretania Street were previously evaluated during the Alternatives Analysis process for either an elevated or underground alignment and determined to be inferior to Halekauwila Street based on a number of considerations. The effects from a Queen Street alignment are discussed previously in this letter. In addition, Queen Street is narrower than Halekauwila Street. An elevated system on either Beretania Street or King Street would run in front of either the State Capital or Iolani Palace and would require removal of traffic lanes.

As stated above, DTS is coordinating with the GSA so the Project complies with applicable courthouse security requirements.

Laura Thielen, Chairperson
State of Hawaii
Department of Land & Natural Resources
P.O. Box 621
Honolulu, HI 96809

Dear Ms. Thielen:

Subject: Honolulu High-Capacity Transit Corridor Project

Comments Received on the Draft Environmental Impact Statement

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Preferred Alternative (23 C.F.R. § 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:

Historic Preservation

Preliminary effect determinations documented in the Draft EIS were refined in the Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (RTD 2009) issued by

FTA on April 14, 2009. This report analyzes the project's direct, indirect, and cumulative impacts to historic properties. Consultation with the SHPD has continued since release of the

Draft EIS with regard to these effect determinations. FTA has accepted adverse effect determinations on the NHL and Chinatown Historic District as well as other historic resources.

The eligibility, effect determinations and Section 106 consultation are documented in Section

4.16, Archaeological, Cultural, and Historic Resources, of this Final EIS.

Naval Air Station Barbers Point is not included in the Project's APE because the Kapolei Extension is not part of the current Project; no further analysis of the Kapolei Extension will be

conducted at this time. If the Kapolei Extension is considered and studied in the future, potential

impacts to historic resources identified in this area would be addressed at that time.

Section 4.16.3 identifies right-of-way acquisition for each of the eligible historic resources. Right-of-way acquisitions for all properties are included in Appendix C of this Final EIS.

Visual impacts to the settings of historic resources were addressed in Historic Effects Report: Honolulu High-Capacity Transit Corridor Project (April 14, 2009). In addition, Section

4.8, Visual and Aesthetic Conditions of this Final EIS includes the visual impact analysis of the

Project. Figures and simulations that were included in the Honolulu High-Capacity Transit

Corridor Project Visual and Aesthetics Resources Technical Report (RTD 2008e) and were

utilized in the preparation of the Draft EIS have been copied into the FEIS to clarify the information from previous studies. Commenters on view effects are representative of the various viewer groups that have been considered in the visual and aesthetic conditions analysis

presented in the Draft EIS and this Final EIS. Inclusion of the viewer group's responses, received during the Draft EIS comment period, resulted in refinement of the visual impact

evaluation which resulted in revised ratings from moderate to significant for Views 12, 14 and 15

in the Downtown area as described in the Final EIS. The visual impact rating was refined to

reflect the bulk and scale of the station as well as the other elements noted in the Draft EIS.

The Draft EIS described several types of visual effects and the refinements reflect the same

type of visual effects identified in the Draft EIS and shown in these viewpoints in the Draft EIS.

The Draft EIS concluded that changes to some views including protected views and vistas would be unavoidable, and the refinements confirmed this conclusion. View planes from traditional look out points such as Puuokapolei and Puu Makakilo were considered in the analysis of the Project as documented Honolulu High-Capacity Transit Corridor Project Visual and Aesthetics Resources Technical Report (RTD 2008e). The Draft and Final EIS acknowledge that the visual changes from the Project will likely be less obtrusive and minimal in wider vistas or regional panoramic views, such as from traditional outlook points where the project elements serve as smaller components of the larger landscape. The project elements would not be dominant features in these views. Mitigation measures to minimize visual effects of the Project and enhance the visual and aesthetic opportunities will be incorporated into the Project during final design as discussed in Section 4.8.3 of this Final EIS. Although mitigation measures will minimize many adverse visual effects by providing visual buffers and reducing visual contrasts between the Project elements and their surroundings, the Final EIS acknowledges, as concluded in the Draft EIS, that probable unavoidable adverse effects, such as view blockage, cannot be mitigated and will be significant (noted as a "High" level of visual impact in the Draft EIS) in some areas. Chapter 5 of this Final EIS, Section 4(f) Evaluation discusses the historic resources identified in Section 4.16 of this Final EIS in the Section 4(f) Evaluation. The Section 4(f) evaluation includes a discussion of the direct use, including de minimis use where the historic resources will not be adversely affected as described in 36 CFR Section 880.5 (Section 5.5.2 of this Final EIS). An evaluation of the constructive use at the historic resources where the Section 106 process has resulted in an adverse effect and where the Project will not result in a direct use was completed. The Project will not restrict any access to historic resources, will have no adverse noise and vibration impacts (per FTA standards), and result in no ecological intrusions at these Section 4 (f) resources. Therefore, only visual impacts that substantially impair the historic value were considered for the Section 4(f) historic resources. This evaluation concludes that there will be no use of Section 4(f) resources since the Project will not substantially impact the features or attributes of the historic resources that contribute to NRHP eligibility (Section 5.6.3 of this Final EIS). There may be potential impacts to previously identified or unknown archaeological resources during construction. As described in Section 4.18.11, Archaeological, Cultural, and Historic Resources [Construction Phase Effects], in this Final EIS, prior to construction, the

Project will investigate the potential for subsurface deposits within the column locations and will mitigate during construction. SHPD will be consulted throughout the process. The Oahu Island Burial Council, Hui Malama I Na Kupuna O Hawaii Nei, and the Office of Hawaiian Affairs are included in the list of Section 106 Consulting Parties as documented in Section 4.16, in this Final EIS.

While the Project was designed to avoid and minimize effects to historic resources, this was not always possible in meeting the Project's Purpose and Need. Therefore, a Programmatic Agreement (PA) was prepared to outline responsibilities and measures to mitigate or reduce adverse Project effects. The PA was developed during extensive consultation with Section 106 consulting parties and included mitigation measures suggested by these consulting parties when possible. The PA is included in the Appendix H of the Final EIS.

Aquatics and Water Resource Management

Section 4.14 of this Final EIS discusses the streams that will be crossed by the Project and permanent impacts to streams. Section 4.18.10 of this Final EIS discusses the temporary impacts to streams during construction. Streams affected by structural elements of the Project are include Kalol Gulch, Waiawa Stream and Springs, Moanaulua Stream, Kapalama Canal Stream, and and Nuuanu Stream. On September 15, 2009, the Army Corps of Engineers stated that its substantive concerns relating to Section 404 of the Clean Waters Act had been addressed and that the scope and intensity of impacts to jurisdictional waters of the United States are now relatively minor due to the extent of avoidance and minimization of impacts on the aquatic environment resulting from project site selection and design. Of the streams listed above, Kalol Gulch is not under the jurisdiction of the USACE.

The analysis of aquatic biota from technical studies completed in technical studies prepared prior to the Draft EIS, and refinement as part of the "functions and values" assessment or each stream that the Project crosses confirms the conclusion made in the Draft EIS that permanent or temporary structures placed in streams will interfere with migration by an amphidromous species through the project area as presented in Section 4.14.3 of this Final EIS.

Permanent and temporary (during construction) best management practices (BMPs) will be implemented to minimize the potential impacts to the aquatic environment as discussed in Section 4.14.3, Environmental Consequences and Mitigation [Water], in this Final EIS, examples of Permanent BMPs include, but are not limited to bioretention areas, vegetated buffer strips, dry swales, water quality basin, and structural BMPs with oil/water separators.

Section 4.18.10 Water Resources [Construction Phase Effects], in this Final EIS discusses BMP for in-water construction activities.

Mitigation regarding re-planting cleared areas to prevent erosion is discussed in Sections 4.18.8, Natural Resources [Construction Phase Effects] and 4.18.10 Water Resources

[Construction Phase Effects] in this Final EIS.

Because of the construction schedule and difficulty in anticipating water events, RTD cannot entirely avoid construction during rainfall; however BMP will be employed to minimize

impacts associated with construction stormwater flow.

Section 4.18, Construction Phase Effects, in this Final EIS provide examples of BMPs that may be employed to protect the aquatic environment. BMPs will include methods to minimize possible pollution, soil erosion and turbidity caused by stormwater runoff and construction activities near waters

Permanent and temporary (construction related) BMPs will be implemented for the parkand-

ride lots and vehicle maintenance and storage yards to maintain on-site infiltration and prevent polluted runoff from entering streams and near shore waters. An integral part of the

permanent BMPs is the inspection and maintenance plan to ensure that they operate as designed.

The Clean Water Branch of the State Department of Health has provided comment on the Draft EIS. Through the individual Section 401 Water Quality Permit, the Clean Water Branch of the State Department of Health will ensure compliance with the State's antidegradation policy (HAR, Section 11-54-1.1). Section 4.21 Anticipated Permits, Approvals

and Agreements has a list of Anticipated Permits, in this Final EIS includes including a Stream

Channel Alteration permit from DLNR - Water Commission.

Use of water during construction will include but not be limited to concrete mixing, dust management and establishing landscape elements. It is anticipated the contractor will use nonpotable

water, where practicable, to construct the elevated guideway structures or utilize other construction methods to conserve water. Once the Project is operational it is anticipated that

non-potable water will also be used where practicable for landscaping and vehicle maintenance.

Landscaping will use vegetation that requires minimal watering. The maintenance and storage

facility will pursue Leadership in LEED Certification. This includes the use of sustainable practices and reduction of the use of resources which may include water and energy.

Permanent use of potable water is anticipated to be limited to station operations and maintenance operations restroom facilities. As discussed in Section 4.19.3 of the Final EIS

additional potable water supplies will be required to support the increase in population and employment as well as restrooms mentioned above. The Project is not anticipated to be a major

water consumer.

Engineering

As described above streams affected by structural elements of the Project are; Waiawa

Stream and Springs, Moanaulua Strea, Kapalama Canal Stream, and and Nuuanu Stream.

Section 4.18.10 Water Resources [Construction Phase Effects] details the types of temporary construction-phase impacts and mitigation measures. The City will obtain the required permits from Federal and State agencies as listed in Section 4.21 of this Final EIS. During the processing for these permits any further aquatic and biological/environmental issues will be assessed and mitigation measures finalized as part of the permit process.

In Section 4.14.3 of the Final EIS, it states: As a linear feature, the guideway will cross several floodplains in Waipahu and Pearl Highlands. However, the Project will not cause significant floodplain encroachment as defined by USDOT Order 5650.2. The guideway and

many stations will be elevated above the floodplain by piers, but some facilities, such as stairs, elevators and traction power substations will have to be built at ground level. These features

could have minor effects on floodplains, depending on how and where they are placed within a floodplain see figures in this section. However, any such changes caused by the Project will be

mitigated through design to comply with current floodzone regulations. There will be no notable

adverse impacts on natural and beneficial floodplain values and there will be no impact to water levels in flood zones.

As there will be no notable adverse impacts on natural and beneficial floodplain values, A Conditional Letter of Map Revision (CLOMR) will not be necessary.

Information noted. We have been in contact with the City and County of Honolulu's Department of Planning and Permitting.

Comments regarding the National Flood Insurance Program and the City and County's flood ordinances are noted.

Land

Comments regarding DLNR's development plans for land parcels are noted.

Coordination with Right of Way and DLNR is continuing.

The parcels that will be acquired for the Project are presented in and Appendix C of this Final EIS. This Appendix includes tables of the property acquisition by tax number and general

land use. The City will continue to coordinate with DLNR regarding the use or transfer of any

DLNR lands. The City will comply with Section 171-11, HRS, regarding the use of State Lands.

Forestry and Wildlife

*The table: Summary of the Project's Effects on Threatened, Endangered, and Protected Species, in Section 4.13.3 of this Final EIS, lists *Abutilon menziesii* (kooloaula) as endangered.*

*If Although the Project will have no effect on threatened, endangered, and protected species, mitigation will be implemented for the *Abutilon* plants, kooloaula. A State Incidental*

Take License for kooloaula was issued on March 18, 2005, to the HDOT. The City will secure a Certificate of Inclusion from the State for the Project. Mitigation measures have already been specified in and HCP for the population of kooloaula, including the establishment of an 18-acre contingency reserve for the plants. Specific measures to protect and offset losses of the kooloaula have been established by the USFWS in the existing HCP. If and HCP is needed or if the existing HCP needs to be amended, the City will implement the measures outline of the USFWS in the new or amended HCP. This will offset impacts to the plant, and there will be no unavoidable adverse environmental effect to the kooloaula. Additionally, prior to clearing and grubbing near the kooloaula contingency reserve, the area will be surveyed. Of any kooloaula are found, a horticulturist approved by DLNR will be given an opportunity to remove the plants and transplant them to the contingency reserve.

Fire Management Plans, including worker education, access maintenance, designated smoking areas, identification of fire fighting resources, and other requirements, are being reviewed for other projects in the area and will be incorporated into the Project. Prior to construction in the Kapolei-Ewa area, the construction area outside the Habitat Conservation Plan (HCP) will be surveyed for existing Abutilon plants. If any are found, a new Habitat Conservation Plan will be prepared or the existing HCP will be amended. The Project contract documents describe the requirements for construction equipment or material imported to Oahu from the mainland, neighbor islands or foreign countries be free of dirt, vegetative matter, and animals. Construction equipment will have to be washed before being brought to the Project site. On site workers will be trained to recognize common invasive species growing in the construction area. The use of native (indigenous and endemic) and proven adapted species is encouraged. Criteria for cleaning, inspection and treatment of plants that are at risk of harboring pests are included in the mitigation described in Section 4.18.9 of the Final EIS.

Section 4.18.8, Natural Resources, in this Final EIS describes that prior to construction, the City will survey all the large canopy trees to be pruned to be sure no chicks that have not yet fledged are present, including the State-listed threatened species, white tern.

Section 4.13.3, Environmental Consequences and Mitigation [Ecosystems], in this Final EIS discusses tree removal and specifically addresses the white tern. White terns select the largest high canopy trees for roosting and nesting. The pruning and removal of these trees are

not expected to affect the white tern population because there are numerous other large canopy trees in the urban area of Honolulu that will not be affected by the Project and that could be used by the white terns.

State Parks

Section 4.5 in this Final EIS identifies Federal, state, local and publicly owned parks adjacent to the Project. This section also lists the Hawaii Disabled American Veteran's Memorial

as a government facility adjacent to the Project.

Section 5.5.1, Park and Recreational Resources,] of the Final EIS presents a the Section 4(f) evaluation of Keehi Lagoon Beach Park. Coordination with the City Department of Parks

and Recreation is will continue during final design and construction. Project design was intended to avoid impacts to the Hawaii Disabled American Veteran's Memorial and the Project

impact at Keehi Lagoon Park does not affect the Memorial.

Section 5.6.1, Park and Recreational Resources, [Evaluation of Constructive Use of Section 4(f) Resources] of the Final EIS presents a constructive use analysis in accordance with

23 CFR 774.15. 'Aiea Bay State Recreation Area was evaluated in the same Section. The

analysis presented in the Final EIS concluded, "...the elevated guideway would be located

mauka of the park, within the median of the adjacent highway and as a result, will not obstruct

makai views. There will be no noise or vibration impacts from the Project...and features will not

be substantially impaired, the Project will not result in a constructive use of the resource.

Brennon T. Morioka, Director
State of Hawai'i Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097

Dear Mr. Morioka:

Subject: Honolulu High-Capacity Transit Corridor Project

Comments Received on the Draft Environmental Impact Statement

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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:

Airports

1. *As stated in your letter, there are two stations proposed for Honolulu International Airport property—one next to the recently constructed parking garage and one on Aolele Street approximately 1,000 feet west of Lagoon Drive. Project staff has and will continue to coordinate with HDOT Airports Division Planning staff.*
2. *Project staff will continue to coordinate with HDOT Airports Division Planning staff, specifically on the connection between the rail station and airport terminals. Signage and wayfinding are being addressed in the station design process.*
3. *FAA Form 7460-1 will be submitted to the Federal Aviation Administration at the appropriate time, which is about 2 years prior to construction. This has been added to the list of permits and approvals in Section 4.21 of the Final EIS.*
4. *DTS has consulted with the Transportation Security Administration (TSA) regarding security requirements and will continue to coordinate with TSA throughout design, construction, and implementation of the Project to ensure that security requirements and concerns are addressed.*

Harbors

1. *Your comment regarding the interface between the Project and Nimitz Highway is noted.*
 - a. *Thank you for being amenable to locating a station in your building. Station locations were selected in part to minimize negative effects and geometric challenges (such as building on a curve) and maximize opportunities to serve the community and promote ridership. The Downtown station location was selected for Nimitz Highway between Alakea and Bishop Streets because it was the best location from a geometric design perspective and allowed the station to serve the center of town effectively.*
 - b. *The identified location for the Downtown Station emphasizes pedestrian safety by connecting the mauka and makai sides of Nimitz Highway with a concourse, thus providing access to the waterfront, Aloha Tower Marketplace, and Downtown destinations. Alternative Downtown station locations were evaluated in Chapter 5 of the Final EIS.*
- As stated in Section 2.5.5 of the Final EIS, design criteria developed for Project stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for safety reasons. The design criteria also state that, as a non-motorized mode, bicycles will be given second*

priority.

2. In response to your comment, the reference to Kewalo Basin operations has been revised in the Final EIS.

3. In response to your comment, text in Section 3.3.4 of the Final EIS has been revised as follows: "Ocean transportation, shipbuilding and repair, commercial fishing, ocean recreation

(as operated by the Division of Land and Natural Resources), and other support industries are

the main activities in Oahu's commercial harbors."

4. In response to your comment, the sentence has been revised to read: "Trucks carrying freight enter and exit Honolulu Harbor on Nimitz Highway and Ala Moana Boulevard

and use all major highways and freeways on Oahu."

5. In response to your comment, Kalihi Street has been identified as a freight route in the Final EIS.

6. In response to your comment, the reference to Kalaeloa Barbers Point has been revised in the Final EIS.

7. In the Final EIS (Section 3.5.6), a Maintenance of Traffic Plan and Transit Mitigation Program will identify measures to mitigate temporary construction-related effects on transportation. These plans and programs will be developed by the construction contractor for

each phase, approved by the City, and coordinated with and approved by HDOT for those

segments in HDOT highways.

8. The affected environment discussion referenced by the comment is found under the Kalihi to Ala Moana Center Landscape Unit heading in Section 4.8.2 of the Final EIS.

The

discussion mentions that the mountains and shoreline that define the mauka and makai edge of

this landscape unit are dominant elements of the landscape. The Kewalo Basin is part of this

landscape.

9. In response to your comment, Table 4-39 of the Final EIS has been revised to include "Oahu Commercial Harbors 2020 Master Plan improvements," and Kalaeloa Barbers Point

Harbor and Honolulu Harbor will be removed in lieu of the Oahu Commercial Harbors replacement.

Highways

1. In 2005, the FTA provided guidance to RTD that a 2030 planning horizon could be used, provided that it is consistent with forecasts used by the local metropolitan planning organization (MPO). The planning horizon used for this project corresponds to that used by the

Oahu Regional Transportation Plan developed by the OahuMPO. This provides consistency

with the Island's long-range plan. 2030 was the longest comprehensive planning horizon existing in Honolulu at the time the Project was developed.

2. Our understanding is that HAR 11-46 regarding Community Noise Control is not intended to be used for transportation projects. As the purpose states: "It is the purpose of this

chapter to define the maximum permissible sound levels, and to provide for the prevention,

control, and abatement of noise pollution in the State from the following excessive noise sources: stationary noise sources; and equipment related to agricultural, construction, and industrial activities. It is also the purpose of this chapter to establish noise quality standards to protect public health and welfare, and to prevent the significant degradation of the environment and quality of life.”

3. DTS will continue the ongoing regular coordination with HDOT as the Project progresses.

4. DTS has developed specifications and design criteria to address the City and County of Honolulu’s architecture and landscape architecture requirements for the Project, including

stations. Where appropriate, the City will use the applicable DOT Highway standards.

a. Landscape plans for work performed on State Highways will be prepared and submitted to HDOT for review. Construction contractors will be required to maintain designated landscape areas in accordance with Hawaii Standard Specifications Section 643—Maintenance of Existing Landscape Areas. Section 4.8.3 of the Final EIS provides a more detailed description of applicable design criteria.

b. Your comment is noted and DTS will comply. Trees (suitable for transplanting) displaced by construction will be relocated to a City and County of Honolulu project nursery until they can be transplanted to another part of the project area. DTS will coordinate with HDOT’s Highway Landscape Architect. This requirement is included in the project design criteria, which is summarized in Section 4.8.3 of the Final EIS.

Invasive species management during construction is discussed in Section 4.18.9 of the Final EIS.

c. DTS will coordinate with HDOT on the location of relocated utilities. As described in Section 4.8.3 of the Final EIS, tall vertical plantings for vines will be used to screen or minimize the impact of the traction power substation structures, as appropriate. Plants or vines will be a minimum of 6 feet high in secure areas while maintaining

visibility to the entrances. New utility boxes will be screened by landscaping or placed in underground vaults.

d. A reference to development of a maintenance agreement has been added to Section 4.21 of the Final EIS.

e. For those areas of the Project in HDOT roadways, landscape plans, including those covering median areas, will be prepared and submitted to HDOT for review. This requirement has been added to Table 4-38 of the Final EIS.

f. The American Society of Landscape Architects’ Invasive Species List has been incorporated into the design criteria as a “do not plant” list. A plant palette of native species has also been included with encouragement for their use and caution to consider water and nutrient requirements.

g. Design of the stations and guideway will include measures to limit bird nesting and perches, as appropriate. This is addressed in the Project design criteria.

5. Construction Criteria

a. The contractor shall be required to maintain designated landscape areas in accordance with Hawaii Standard Specifications Section 643—Maintenance of Existing Landscape Areas. Section 4.18.3 of the Final EIS includes mitigation that vegetation is to be replaced as soon as practical after construction is completed.

b. The contractor shall be required to maintain designated landscape areas and

repair damaged irrigation in accordance with Hawaii Standard Specifications Section 643—Maintenance of Existing Landscape Areas and Section 644—Repair of Existing Sprinkler System. Detailed material salvage procedures are incorporated into the construction contract documents, specifically in Standard Specification 02 41 00—Demolition. The materials will be returned to HDOT at the Oahu District Baseyard.

6. Farrington Highway/Fort Weaver Road to Interstate H-1

a. Comments regarding the Farrington Highway improvements are noted.

b. Comments regarding the effect which the Farrington Highway improvements have had on the Waipahu community are noted.

c. DTS will coordinate and consult with HDOT and other agencies, as appropriate, on the final design of the streetscape affected by the Project.

d. Your comment is noted and DTS will comply. Trees (suitable for transplanting) displaced by construction will be relocated to a City and County project nursery until they can be transplanted to another part of the project area. DTS will coordinate with HDOT's Highway Landscape Architect. This requirement is included in the Project design criteria.

7. DTS will coordinate and consult with HDOT and other agencies as appropriate on the final design of the streetscape affected by the Project.

8. (no title given)

a. DTS will coordinate and consult with HDOT and other agencies as appropriate on the final design of the streetscape affected by the Project.

b. Your comment is noted and DTS will comply. Trees (suitable for transplanting) displaced by construction will be relocated to a City and County project nursery until they can be transplanted to another part of the project area. DTS will coordinate with HDOT's Highway Landscape Architect. This requirement is included in the Project design criteria. Project staff will continue to coordinate with HDOT staff and provide updates as requested. In all cases, the City will work with HDOT and the local communities as final designs are developed for each area as noted earlier in the design criteria response. Street trees, sidewalks, and other hardscape and landscape improvements will be developed in coordination with HDOT to maintain an attractive environment along the entire corridor.

Kiersten Faulkner, Executive Director
Historic Hawaii Foundation
680 Iwilei Road, Suite 690
Honolulu, HI 96817

Dear Ms. Faulkner:

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 should focus on the

Preferred Alternative (23 C.F.R. § 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:

Per the notification to the State Historic Preservation Division of the use of 36 CFR Chapter 800.8(c), comments received on the Draft EIS were also considered as comments on the Section 106 process.

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 future extensions are proposed for implementation in the future, environmental analysis of the extensions and appropriate alternatives will be undertaken at that time. The future Kapolei Extension, including areas Ewa of the proposed East Kapolei Station, Marine Corps Air Station Ewa Field, and Naval Air Station Barbers Point, is not included in the Project. No further analysis of the Kapolei Extension will be conducted at this time. If the Kapolei Extension is considered and studied in the future, potential project impacts to historic resources identified in this area will be addressed at that time. Based on concerns raised by Section 106 consulting parties, preliminary effects determinations as shown in the Draft EIS were reevaluated as part of intensive-level

assessments and documented in the *Historic Effects Report: Honolulu High-Capacity Transit Corridor Project* (April 2009) issued by FTA on April 14, 2009. Both direct and indirect effects to historic properties were reconsidered in this report. These include, as appropriate under effects criteria, the visual effects on historic properties and landscapes. Following consultation, the State Historic Preservation Division (SHPD) concurred with all twenty-two adverse effect determinations and also provided comment that project impacts be considered as adverse effect to eleven additional resources. The Project accepted these recommendations. These determinations of effect are documented in Section 4.16 and Appendix H of the Final EIS. Chinatown and U.S. Naval Base, Pearl Harbor National Historic Landmark are among resources to receive an adverse effect determination. The *Historic Effects Report* is available on the project website (www.honolulutransit.org) and from the Department of Transportation Services. Table 4-10 of the Draft EIS generally addressed the project's visual impacts. Section 106 evaluations regarding visual impacts assess the project's effect to historically significant settings with integrity and/or visual characteristics of historic properties. If a historic property does not retain historic setting and/or historically significant visual characteristics, visual impacts to the property may represent an effect but may not be considered adverse. Table 4-32 in the Draft EIS is Table 4-34, *Historic Properties within Project's Area of Potential Effect*, in the Final EIS. In the Final EIS, this table presents the determination of effect and a brief description of the effect. The determination of effect was made with consideration of input from the consulting parties and was concurred to by the SHPD. More detailed descriptions of the properties and the effects determination is presented in the *Historic Effects Report: Honolulu High-Capacity Transit Corridor Project* (April 2009). 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. In addition, viewers in upper stories of some buildings would be affected by light and glare from trains traveling on the guideway. The overall objectives and design guidelines for the neighborhoods with planned stations will be addressed during the ongoing station areas planning process. This process involves numerous aspects of transit system design with focus on characteristics and

preferences of the communities adjacent to stations. In addition, the following measures will be Project to minimize negative visual effects and enhance the visual and aesthetic opportunities

that the Project 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 transit oriented development planning and 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.

The policy documents that identify significant views and vistas include the Ewa Development

Plan (DPP 2002), Central Oahu Sustainable Communities Plan (DPP 2002), and Primary Urban

Center Development Plan. These documents are referenced in the visual analysis in Section

4.8 of the Final EIS. The visual effects on Honolulu's Downtown, including the Dillingham Transportation Building are discussed under the Kalihi to Ala Moana Center Landscape Unit

heading starting in Section 4.8.3 of the Final EIS. In addition, please refer to Section 4.16 of the

Final EIS for a discussion of the historic resources qualities of this building and Chapter 5

(Section 4(f) Evaluation) for further discussions of the Project's visual effects.

Visual effects as they pertain to historic resources in particular are discussed in the Historic Effects Reports, by resource.

The Pearl Harbor National Historic Landmark is discussed in Section 4.8.3, [Visual Effects] Environmental Consequences and Mitigation, and in Section 4.16.3

[Archaeological,

Cultural, and Historic Resources] Environmental Consequences and Mitigation. The Final EIS

documents the SHPD's opinion that the project would have an adverse effect to the landmark.

The assessment of the visual effect (in Section 4.8.3, [Visual Effects] Environmental Consequences and Mitigation of the Final EIS) notes that the existing viewshed includes transportation infrastructure, namely the Kamehameha Highway.

The visual effects of the Chinatown Station are discussed under the Kalihi to Ala Moana Center Landscape Unit heading starting in Section 4.8.3, Environmental Consequences and

Mitigation [Visual] in this Final EIS. The discussion notes the station and guideway will be the

dominant features in views along the Nimitz Highway and that distant views over the Nuuanu

Stream and Honolulu Harbor will be partially blocked. The overall objectives and design for the

Chinatown District will be addressed during the ongoing station areas planning process.

This

process involves numerous aspects of transit system design with focus on characteristics and preferences of the communities adjacent to stations. Coordination with SHPD has included the Chinatown District. Following consultation, SHPD concurred with the effect determinations on the Chinatown Historic District and the Hawaii Capital Historic District. These determinations of and Historic Resources and Appendix H of the Final EIS. A Programmatic Agreement describing measures taken to avoid, minimize, and mitigate historic properties has been agreed upon by consulting parties. Historic Hawaii Foundation was involved in the development of the agreement. The Programmatic Agreement is included in Appendix H, and a summary of these measures has been included in Section 4.16.3 Environmental Consequences and Mitigation [Archaeological, Cultural, and Historic Resources] in this Final EIS.

Kirk Belsby
Kamehameha Schools
567 South King Street
Honolulu, HI 96813-3036

Dear Mr. Belsby:

Subject: Honolulu High-Capacity Transit Corridor Project

Comments Received on the Draft Environmental Impact Statement

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Preferred Alternative (23 C.F.R. § 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:

I Impacts Of Construction On Business

A. Physical Impacts

Response to Comment #1 – Construction activities could have substantial economic impacts on businesses and more specific discussion of the construction

impacts and proposed mitigation measures is requested.

Economic impacts during construction are presented in the Final EIS. Section 4.18.1 of the Final EIS lists mitigation measures to reduce adverse economic hardships for existing

businesses (including small businesses) along the project alignment during construction

As stated in Section 4.18.1 of the Final EIS, advance notice will be provided if utilities will be disrupted and major utility shut-offs will be scheduled during non-business hours.

In

addition, coordination is required with property owners regarding, but not limited to, underground utility service connections, access or driveway reconstruction, utility disruption,

water service, grounding work, demolition, landscape protection, landscape restoration, fencing,

mail delivery, and garbage collection. This includes notifying and working with adjacent property owners regarding non-state roadways and roadway rights-of-way. Section

4.18.4 of

the Final EIS states that watering trucks could be used to minimize dust.

Your suggestions regarding the Maintenance of Traffic (MOT) Plan and Transit Mitigation Program have been noted. Many of the suggestions are already discussed in the

Final EIS. For instance, Section 4.18.1 of the Final EIS states that, “access to businesses near

construction activities could be temporarily affected but will be maintained.” In addition, “to the

extent practicable, [the Project will] coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales

periods.” As stated in the previous paragraph, advanced notice will be provided if utilities will be

disrupted and shut-offs will be scheduled during non-business hours. Sections 3.5.6 and 4.18.1

of the Final EIS discuss public involvement activities that will occur during construction.

Many

of the other suggested elements in your letter have been incorporated into the construction

contract documents as performance specifications or as design criteria. Regarding the request

for covered walkways in lieu of chain-link fencing, the contractor will be required to provide a

covering if the Project affects an adjacent awning or where there is a potential for falling debris.

Covering provided in other situations could be considered on a case-by-case basis, subject to

City approval. In addition, allowing artwork on fences could also be considered on a case-by-case

basis subject to City approval.

The request to prepare a Business Disruption Mitigation Plan will be considered during the development of detailed construction mitigation procedures. Some elements, such as

having a staff person work directly with the public and property owners to resolve construction-related

problems, will be part of the MOT Plan or public information program. The DTS will work with all adjacent property owners and their tenants during construction to minimize disruption to

local businesses.

B. Economic Impacts

Response to Comment # 2 – KS requests that the discussion of economic impacts in the DEIS be expanded through an independent study and recommends certain mitigation measures.

An analysis of the impacts to businesses during construction is provided in both the

Final EIS and the Honolulu High-Capacity Transit Corridor Project Economics Technical Report

(RTD 2008c). An analysis of construction impacts is shown on page 5-6 of the

Economics

Technical Report, which can be found on the project website at www.honolulutransit.org.

The

primary impacts are anticipated to result from inconveniences and disruptions to adjacent

residents, businesses, and business customers that are inherent in any major construction

project, which include the following:

Presence of construction workers and material.

- Temporary road closures and traffic diversions.*
- Temporary reductions in parking availability.*
- Airborne dust, noise, and vibrations.*
- Businesses' loss of visibility to their customers.*

Proper controls during construction, as discussed in Section 4.18 of the Final EIS, may help mitigate these effects to protect residents' comfort and daily life, as well as to prevent

inconveniences and disruptions to the flow of customers, employees, materials, and supplies to

and from area businesses based on successful efforts on other projects.

Among the measures to be considered during construction are the following:

- Maintaining access to businesses during construction.*
- Developing a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- Initiating public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- Minimizing the extent and number of businesses, jobs, and access affected during construction.*
- Coordinating the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods—to the extent practicable.*
- Minimizing the duration of modified or lost access to businesses—as practicable.*
- Providing signage, lighting, or other information to indicate that businesses are open.*
- Providing public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on*

television and radio.

- Phasing construction in each area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons.

- Providing advance notice if utilities will be disrupted.

- Scheduling major utility shut-offs during non-business hours.

No independent evaluation study is planned. The Project is only one of the factors that could

affect the economics of properties in the corridor.

The City will not provide direct financial assistance to mitigate impacts to businesses.

Support for measures to minimize hardships will be evaluated on a case-by-case basis.

Whether businesses remain open or closed/relocated during construction is often due to economic conditions and other factors outside of the control of the Project II. **Potential**

Parking Impacts of Completed System

A. Potential Parking Impacts

Response to Comment #3 – Inadequate parking for the Project will have economic consequences on surrounding businesses and properties

The comment involves three types of potential parking-related effects: lost off-street parking, lost on-street parking, and spillover parking in station areas. The number and location

of on-street and off-street parking spaces to be removed by the Project are listed in Table 3-24

in the Final EIS. The estimated demand for spillover parking at each station is shown in Table

3-22 in the Final EIS.

As stated in Section 3.4.6 of the Final EIS, properties related to affected private, offstreet parking spaces will be acquired for the Project as part of right-of-way needed along the length of the corridor. Compensation will be in accordance with the requirements of the Federal

Uniform Relocation Assistance and Real Property Acquisition Policies Act. The City will work

with property owners to tailor any mitigation efforts for lost off-street parking as appropriate.

Regarding the loss of on-street parking, a survey of parking usage conducted in April

2009 found that, in locations where on-street parking will be removed by the Project, other parking capacity exists nearby to accommodate demand. Therefore, these on-street parking spaces will generally not be replaced by the City. However, some new on-street parking spaces will be created by the Project in the same general locations as the streets are rebuilt after project construction. New parking spaces could be short-term, long-term, or loading zones, depending on the need.

The effect of spillover parking will increase demand for existing parking spaces near stations. The travel demand forecasting model estimates a spillover parking demand of about 5 parking spaces near Kapalama Station. The City will consider strategies in coordination with appropriate stakeholders to mitigate for any loss of parking supply and for increased demand from spillover parking near stations, if such impacts occur.

B. Mitigation Measures for Parking

Response to Comment #4 – The City is requested to develop more specific mitigation measures for parking

Please see the response to Comment #3 under II A (above **Stations**)

A. Physical Impacts

1. Traffic, Visibility, and Access to Businesses

Response to Comment #5 – A more detailed assessment of the reduction in visibility and access to business and potential mitigation measures is requested

a. Visibility

The assessment of visual effects discussed in Section 4.8 of the Final EIS considers businesses, which include owners, customers, and employees, as important viewer groups. Each viewer group's characteristics were considered in the visual quality assessment for the viewpoints analyzed in Section 4.8 of the Final EIS. For example, the visibility for motorists along Dillingham Boulevard is illustrated on Figure 4-29 (Viewpoint 10) in the Final EIS. The simulated view shows that the overhead guideway will not block views of businesses or signage. The guideway support columns will be spaced at about

150 foot intervals, and views of businesses will not be greatly reduced.

The overall visual effect, as noted in Table 4-9, will be moderate.

More detail on this analysis can be found in the Honolulu High-Capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008e).

Please refer to the following tables in that report:

- *Table 4-1: Landscape Unit 1 Viewpoints—Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the East Kapolei to Fort Weaver Road Landscape Unit in the Draft EIS).*
- *Table 4-2: Landscape Unit 2 Viewpoints—Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Fort Weaver Road to Aloha Stadium Landscape Unit in the Draft EIS).*
- *Table 4-3: Landscape Unit 3 Viewpoints—Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Aloha Stadium to Kalihi Landscape Unit in the Draft EIS).*
- *Table 4-4: Landscape Unit 4 Viewpoints—Existing Visual Quality and Viewer Groups (this Landscape Unit corresponds to the Kalihi to Ala Moana Landscape Unit in the Draft EIS).*

b. Access

Access to all businesses located near the Project will be maintained.

Traffic conditions will operate at acceptable levels-of-service except for four station areas: East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Center. As shown in Table 3-23 of the Final EIS, park-and-ride, passenger dropoffs, and feeder buses will affect traffic at six intersections near these stations; however, measures included with the Project will mitigate these effects. These measures include traffic signalization and adding roadway lanes. Mitigation measures are discussed in Section 3.4.6 of the Final EIS.

c. Narrower Lanes

As indicated in Section 3.4.3 of the Final EIS, the guideway placements will not affect overall traffic operations in terms of the number of travel lanes available to motorists. Although the width of some lanes will be narrowed by the Project, they will remain well above the American Association of State Highway and Transportation Officials (AASHTO) recommended minimum standards for urban roadways. During Final Design, the relationship of travel lanes, shoulders, sidewalks, and horizontal clearances to obstructions such as columns will

be considered together in determining the final widths of each item. Some lane widths could be increased from what is shown in Table 3-21. Permits for construction will not be approved unless a roadway is safe and acceptable to the responsible transportation agency. Lane widths will meet AASHTO and the Hawaii Department of Transportation (HDOT) standards and will not be a hazard for larger trucks. In addition, no sidewalks will be permanently closed as a result of the Project, as shown in Table 3-25 of the Final EIS.

d. Mitigation

Section 3.4.6 of the Final EIS identifies strategies that will mitigate potential effects associated with the Project. With mitigation strategies, traffic conditions in the East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Center station areas will operate in a satisfactory manner. With regard to parking-related mitigation, as noted in Section 3.4.6 of the Final EIS, station areas with the highest estimated demands for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Section 3.4.4 of the Final EIS states that in locations where parking will be removed by the Project, other parking capacity generally exists nearby to accommodate demand. The cumulative and indirect effect of removing parking spaces to accommodate the Project will be that some people who parked in those spaces will either use another space nearby, will choose another mode to reach their destination, or may not make the trip at all. The indirect effect of spillover parking around stations will increase demand for existing parking spaces. The City will consider strategies in coordination with appropriate stakeholders to mitigate for any loss of parking supply and for increased demand from spillover parking near stations, if such impacts occur. Mitigation could range from providing additional parking, parking restrictions or regulation, permit parking or shared parking, or other measures as noted in Section 3.4.6 of the Final EIS.

2. Noise and Vibration

Response to Comment #6 – Disclosure of noise and vibrations and their impact according to the time of day

Section 4.10.1 of the Final EIS describes the various noise measurement locations, including the lanais of upper floors of residential buildings. Noise levels at higher-level floors

were measured and analyzed as a result of comments received on the Draft EIS and are shown in Section 4.10.3 of the Final EIS. The results show only moderate noise impacts to one residential building between the proposed Civic Center and Kakaako Stations. With mitigation (wheel skirts and sound absorptive materials), there are no severe noise issues along the corridor as a result of the Project. For the building at 860 Halekauwila Street, sound absorptive material will be required from 200 feet Ewa of Kamani Street to 100 feet Koko Head of Kamani Street—a total of 300 feet. Future buildings above the guideway at similar distances from the guideway can be expected to be exposed to comparable moderate noise levels.

3. Security, Transients, and Crime

Response to Comment #7 - Additional disclosures on security, transients, and crime are requested with more specific mitigation measures

The majority of the system will be located in existing roadway medians, which is not conducive to being used as a shelter. Stations will be patrolled and will be closed at night. The system will include park-and-ride facilities with security and lighting. The City is working with the Honolulu Police Department to develop the system's safety and security program. Security will be provided at all stations, park-and-ride facilities, and on all trains, as detailed in Section 2.5.4 of the Final EIS. As discussed in this section, security measures will include Crime Prevention through Environmental Design principles, which is a theory that proper design and effective use of the built and natural environments can reduce the fear and incidence of crime as well as improve the quality of life. In addition, the City is conducting workshops with communities that will have rail

stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents and businesses to contribute ideas about the appearance of station entryways in the surrounding areas. Ideas generated at the workshops will be incorporated into the station design process. Please plan to attend the workshops and advance the measures listed in your comment during this process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

4. Visual and Aesthetic Impacts

Response to Comment #8 – The elevated system will cause visual blight and additional details on visual and aesthetic impacts for evaluation by viewer groups would allow a more complete analysis.

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in the Draft and Final EISs. As discussed in Section 4.8 of 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
 - Retain existing trees where practical and provide new vegetation
 - Shield exterior lighting
 - Coordinate project design with the City's transit-oriented design (TOD) planning and Department of Planning and Permitting
 - Consult with communities surrounding each station for input on station design elements
- In addition, the City is currently conducting workshops with communities that will have rail

stations. The purpose of the workshops is to engage the public about rail stations and provide opportunities to residents to contribute ideas about the appearance of station entryways in their areas. Ideas generated at the workshops will be incorporated into the station-planning process. For more information and to get involved in this process, please visit the project website at www.honolulutransit.org.

In addition, 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. Section 4.8.3 of the Final EIS contains specific environmental, architectural, and landscape design criteria that will help minimize visual effects of the Project. Design criteria will govern all new utility construction outside of buildings, as well as the maintenance, relocation, and restoration of utilities encountered or affected by construction of the fixed guideway.

A. Economic Impacts

1. Business Impacts

Response to Comment # 9 – KS requests that the discussion in the DEIS of the economic impacts of the completed system on businesses be expanded through an

independent study The Project is the construction and implementation of rail transit service, which is

discussed in the Draft and Final EISs. As discussed in Section 4.19.2 of the Final EIS, TOD is

expected to occur in station areas as an indirect effect of the Project. Based on experiences

with systems in other places with all types of rail systems (i.e., elevated, at-grade, and underground), it is the increased mobility and accessibility afforded by the Project that will increase the desirability and value of land near stations and attract new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be

established and conducted by the City's Department of Planning and Permitting under a

process covered by the City's new TOD Ordinance 09-4. For properties outside the boundaries of TOD station locations, these requested studies are beyond the scope of the Project and the EIS.

As noted earlier, an additional independent study is not planned.

2. Redevelopment

Response to Comment #10 – Elevated rail systems affect redevelopment options in the urban core and require additional mitigation measures

The elevated guideway will require consideration of the most appropriate TOD designs to take full advantage of the space adjacent to the Project and integrate the stations into those

plans. Plans will require adaptation of the elevated station into the adjacent community.

This

approach has been successfully implemented in cities with elevated rail such as Vancouver,

B.C., San Francisco, and Miami.

IV. Cost and Financial Analysis

Response to Comment #11 – Further study of the financial feasibility of the DEIS is suggested

Chapter 6 of the Final EIS describes the financial resources expected to be needed to pay for the capital costs of the Project and for ongoing operating and maintenance costs.

Capital costs of the Project, including finance charges, are expected to be fully paid for by a

combination of FTA Section 5309 New Starts and FTA Section 5307 Funds from the Federal

government and revenues from the General Excise and Use Tax (GET) surcharge levied from

2007 through 2022.

The capital plan for the Project is presented in Section 6.3 of the Final EIS, which includes a description of the amount of funding anticipated from various sources. The capital

plan takes the current economic downturn into account. If the Project is over budget, other

sources of revenue have been identified in Section 6.6 of the Final EIS to cover such short falls;

however, \$1.3 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.

The financial plan will be updated periodically as conditions warrant and as the Project moves ahead. This is a requirement of the Federal New Starts process and is intended to Federal stimulus program are already included in the No Build Alternative and are shown in

Table 2-3 of the Final EIS. All the major stimulus projects are identified in the OahuMPO's

Regional Transportation Plan and were also part of the No Build Alternative in the Draft and

Final EISs against which all the Build Alternatives were compared.

V. Impacts of Land Acquisitions on KS, Its Tenants and Their Businesses

Response to Comment # 12 – KS requests more specific information on what will be acquired by the City and the impact of such acquisitions and compensation to be

provided. Such information should assist KS and its tenants in evaluating how the acquisitions will affect their businesses.

Individual assessments will be performed by the Right-of-Way Team as the design progresses. Right-of-way plans are shown in Appendix C of the Final EIS. Maps show full and

partial acquisitions.

All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. DTS will work with land owners if nonconformities

occur as a result of acquisitions.

If payment is delayed more than 30 days after the final judgment, additional interest at the rate of 5 percent shall be added to the final judgment (Section 100-25, Hawaii

Revised

Statutes). For a Federal-aid project, the cost of this interest payment is not eligible for Federal

reimbursement.

VI. Kelo Concerns

Response to Comment # 13 – KS requests assurances that the City will not take private property to give to another private party, whether in the context of TOD or otherwise.

The Project evaluated in the Draft and Final EISs concerns the construction and implementation of rail transit service. However, as discussed in Section 4.19.2 of the Final EIS, TOD is expected to occur in station areas as an indirect effect of the Project. Planning around stations is currently underway by the City's Department of Planning and Permitting (DPP) under a process covered by the City's new TOD Ordinance 09-4. The TOD ordinance, and subsequent TOD plans, are designed to encourage private investment in the vicinity of the stations, as appropriate. The DPP has encouraged community involvement in the development of those plans. As for the Project, the City will acquire only properties needed to build the Project, which includes about 190 full and partial acquisitions, mostly strip acquisitions along roadways. For any acquisition, the City will follow the law as put forth by the U.S. Supreme Court in the Kelo Decision of 2005.

VII. TODs As Potential Mitigants

Response to Comment #14 – TOD could be a positive mitigant to the impacts described herein; however, it is premature to rely upon the benefits until a TOD ordinance is adopted and developments are integrated into the Project through Planning.

In March 2009, the City Council approved and the Mayor of Honolulu signed Bill 10 (2008) (Ordinance 09-4), which defines the City's approach to TOD around fixed guideway stations. New zoning regulations will address parking standards, new density provisions, land use, open space, and affordable housing. Financial incentives could include public-private partnerships, real property tax credits, and infrastructure financing. In addition, land use impacts are required to be disclosed in an EIS as part of the NEPA process. Land use impacts, including potential TOD development, are critical criteria for FTA in

ranking projects for Federal funding. Potential TOD development is addressed in Section 4.18

of the Draft EIS. This section was updated in the Final EIS to reflect Ordinance 09-4. Evaluation of TOD projects in other cities with new rail projects is beyond the scope of this EIS.

VIII. Study of the North King Street Alignment

Response to Comment #15 – Further Study of the North King Street alignment is recommended

The North King Street alignment was evaluated in the Alternatives Analysis. This alignment would have effected a greater number of parcels located within environmental justice/communities of concern areas (29 parcels of which 2 are residential versus 23 parcels of

which 0 are residential along Dillingham Boulevard). In addition, a North King Street alignment

would have moderate-high visual impacts whereas the Dillingham Boulevard alignment would

have low-moderate visual impacts. The noise analysis conducted revealed moderate impacts at

52 receivers along the North King Street alignment whereas there would be moderate impacts

at 17 receivers along Dillingham Boulevard.

There are 43 cultural practices and resources along the North King Street alignment that would be affected during construction and 2 that would be affected during operation.

With the

Dillingham Boulevard alignment, 23 cultural practices would be affected during construction and

0 would be affected during operation (cultural practices varied from one-time annual events to

churches or community organizations where cultural activities are regularly held). The historic

analysis identified pre-1965 tax map lots within the study corridor. Locations on this list included resources reviewed in previous studies and/or already included in the State Historic

Preservation Division's State and National Register lists. The North King Street alignment is adjacent to 33 historic resources (of which 5 are on either the Hawaii Register or Eligible for the National Register) whereas the Dillingham Boulevard alignment is adjacent to 12 potentially historic resources (of which only 1 is on one of the registers). The North King Street alignment would have required a longer and less efficient route and would have increased the system's cost by \$50 million. This information is provided in the Alternatives Analysis and technical reports prepared for the Alternatives Analysis. The North King Street alignment will not be reexamined as part of the Final EIS.

**IX. Evaluation of An At-Grade or Multi-Modal System in the Urban Core
Response to Comment #16 – An at-grade or multimodal transit system in the urban core is an alternative worth evaluating to determine whether it is less expensive and quicker to construct than an elevated system.**

As stated in Section 2.2 of the Final EIS, prior to selecting an elevated fixed guideway system, a variety of high-capacity transit options were evaluated during the Primary Corridor Transportation Project (1998—2002) and Alternatives Analysis. Options evaluated and rejected included an exclusively at-grade fixed-guideway system using light-rail or bus rapid transit (BRT) vehicles, as well as a mix of options consisting of both at-grade and grade-separated segments.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and Thomas Square/Academy of Arts Special Design Districts. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 different

combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue. Five different alignments through Downtown were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street, a tunnel under King Street, and elevated guideways along Nimitz Highway and Queen Street. The Alternatives Analysis Report (DTS 2006b) evaluated the alignment alternatives based on transportation and overall benefits, environmental and social impacts, and cost considerations. The report found that an at-grade alignment along Hotel Street would require the acquisition of more parcels and affect more burials than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel through the Capital Historic District, in addition to the environmental effects such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, would cost more than \$300 million more than the least expensive alternative. The Project's purpose is "to provide high-capacity rapid transit" in the congested eastwest travel corridor. The need for the Project includes improving corridor mobility and reliability. The at-grade alignment would not meet the Project's Purpose and Need because it could not satisfy the mobility and reliability objectives of the Project. Some of the technical considerations associated with an at-grade versus elevated alignment through Downtown Honolulu include the following:

- **System Capacity, Speed, and Reliability:** *The short, 200-foot blocks (or less) in Downtown Honolulu would permanently limit the system to two-car trains to prevent*

stopped trains from blocking vehicular traffic on cross-streets. Under ideal hour per direction. Based on travel forecasts, the Project will need to carry more than 9,000 passengers by the early 2020s. Moreover, the system can be readily expanded to carry over 25,000 in each direction by reducing the interval between trains (headway) to 90 seconds during the peak period. To preserve a comparable system capacity, speed, and reliability, an at-grade alignment would require a fenced, segregated right-of-way that would eliminate all obstacles to the train's passage, such as vehicular, pedestrian, or bicycle crossings. Even with transit signal priority, the at-grade speeds would be slower and less reliable than an elevated guideway. At-grade system would travel at slower speeds due to the shorter blocks, tight and short radius curves in places within the constrained and congested Downtown street network, the need to obey traffic regulations (e.g., traffic signals) along with other vehicles, and potential conflicts with other at-grade activity such as cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affect an elevated rail system. The elevated rail can travel at its own speed any time of the day regardless of weather, traffic or the need to let cross traffic proceed at intersections.

• **Mixed-Traffic Conflicts:** With the planned three-minute headways, the short cycle of traffic lights would affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the system by reducing the headway to 90 seconds. An at-grade system would also require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion for those who choose to drive. Congestion would not be isolated to the streets that cross the at-grade alignment but instead would spread throughout Downtown. The Final EIS shows that the Project's impact on traffic will be isolated and minimal, and in fact will reduce systemwide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14, Islandwide Daily Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay—Existing Conditions, No Build Alternative, and the Project, in the Final EIS). That is because the elevated guideway will require no removal of existing travel lanes, while providing an attractive, reliable travel alternative. When traffic slows, or even stops due to congestion or incidents, the elevated rail transit will continue to operate without delay or interruption.

The at-grade light rail, with its continuous tracks in-street will create major impediments to turning movements, many of which would have to be closed to eliminate a serious crash hazard. Even where turning movements are designed to be accommodated, atgrade

systems experience significant collision problems. In addition, mixing at-grade fixed guideway vehicles with cars, bicyclists, and pedestrians presents a much higher potential for conflicts compared to grade-separated conditions. Where pedestrian and automobiles cross the tracks in the street network, particularly in areas of high activity (e.g., station areas or intersections) there is a risk of collisions involving trains that does not exist with an elevated system. There is evidence of crashes between trains and cars and trains and pedestrians on other at-grade systems throughout the country. This potential would be especially high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is very high and the aging population presents a

Construction Impacts: *Constructing an at-grade rail system could have more effects than an elevated system in a number of ways. The wider and continuous footprint of an at-grade rail system compared to an elevated rail system (which touches the ground only at discrete column foundations, power substations, and station accessways) increases the potential of utility conflicts and discovery of sensitive cultural resources. In addition, the extra roadway lanes taken away for the system would result in increased congestion or require that additional businesses or homes be taken to widen the roadway through Downtown. Additionally, the duration of short-term construction impacts to the community and environment with an at-grade system would be considerably greater than with an elevated system. Because of differing construction techniques, more lanes would need to be continuously closed for at-grade construction and the closures would last longer than with elevated construction. This would result in a greater disruption to business and residential access.*

Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide impact that would reduce ridership throughout the system.

The at-grade system would not meet the Project's Purpose and Need and therefore does not require additional analysis.