

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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October 1, 2009

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

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:

***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 Aoliele 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.*

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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

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*improvements will be developed in coordination with HDOT to maintain an attractive environment along the entire corridor.*

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

Very truly yours,

WAYNE Y. YOSHIOKA  
Director

Enclosure  
cc: Mr. Ted Matley  
Federal Transit Administration