CS 696

Salutations

Subject: Honolulu High-Capacity Transit Corridor Project

Dear _____:

The U.S. Department of Transportation Federal Transit Administration (FTA) and 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* in November 2008. This letter, which is being distributed in conjunction with the Final EIS, 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 (the Project) as the preferred alternative and is the focus of this document. 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 in this Final EIS. The selection is described in Chapter 2 in this Final EIS. It also includes additional information and analyses, and minor Project revisions that were made to address comments from agencies and the public on the Draft EIS. The following paragraphs address comments received in your letter dated February 9, 2009.

Life of the Land Comment 1 on the Draft EIS
An at-grade system on Hotel Street was evaluated in the Alternatives Analysis that was conducted in 2006 and documented in the *Alternatives Analysis Report* (DTS 2006b). Aside from reduced system speed and operating reliability, it would have resulted in greater environmental impacts in several areas, including more property acquisition requirements and effects to cultural resources compared to other alternatives studied. Mixed-flow at-grade operation was eliminated from consideration based on poor operating speed and ineffective reliability. Further discussion on this is presented in Sections 2.2, Alternatives Screening and Selection Process, and 8.6.13, At-Grade Alternatives, in this Final EIS.

Life of the Land Comment 2 on the Draft EIS
As described in Section 2.2.2, Alternatives Considered in the Alternatives Analysis in this Final EIS, enhanced bus service was considered as part of the Transportation System Management Alternative during the Alternatives Analysis process. It was rejected because it would have provided little transit user benefit, albeit for little cost.

At-grade alternatives were considered in the *Alternatives Analysis Report* (DTS 2006b) and the decision to eliminate these alternatives was explained in subsequent project documents.

Life of the Land Comment 3 on the Draft EIS
See response to Life of the Land Comment 2.

Life of the Land Comment 4 on the Draft EIS
See response to Life of the Land Comment 2.

Life of the Land Comment 6 on the Draft EIS
The Project's technology, which is steel wheel on steel rail, may be operated above grade (elevated), at-grade (street level), or below grade (underground). The requirement is that the system operate in an exclusive right-of-way. To preserve system speed and reliability, neither automobiles nor pedestrians can be allowed to cross the tracks. For at-grade operation this would require a fenced right-of-way with no crossings. It is not possible to construct such a system in developed portions of the corridor such as in the Downtown area. Portions of the alignment in undeveloped areas could be constructed at-grade with a fenced right-of-way, but this would prohibit future development from crossing the guideway at-grade. Placing any part of the system in mixed right-of-way would affect reliability of the entire system.

Life of the Land Comment 7 on the Draft EIS
See response to Life of the Land Comment 6. Regarding costs, an at-grade system is less costly, but the compromise in performance would make it infeasible in Honolulu. A good comparison is Phoenix, which recently opened a fully at-grade system that is 20 miles long, similar in length to this Project. It takes over 1-½ hours to travel from end-to-end compared to the 42 minutes it will take in Honolulu. Phoenix has also had some vehicular and pedestrian safety challenges as people negotiate the streets with the new system. In Phoenix, the at-grade system works because it has plenty of alternative street options for vehicular traffic to use. We do not have that flexibility in Honolulu.

Life of the Land Comment 8 on the Draft EIS
This comment regarding the relative costs of at-grade and elevated rail by segment is not related to the environmental impacts of the Project.

Life of the Land Comment 9 on the Draft EIS
To meet system requirements as outlined in Section 2.5.1, Operating Parameters, in this Final EIS, at-grade operation would require a fenced right-of-way. Cross-streets and local access would preclude at-grade operation adjacent to Farrington Highway in the Waipahu area.

Life of the Land Comment 9 on the Draft EIS
The Project follows Farrington Highway, not H-1 in this area. During the Alternatives Analysis process the Hawai'i State Department of Transportation (HDOT) informed the City and County Department of Transportation Services (DTS) that all of the H-1 right-of-way needs to be preserved for future freeway use.

Life of the Land Comment 10 on the Draft EIS
Lanes along Farrington Highway could not be used for a rail line. One of the requirements of this Project is to operate in exclusive right-of-way. Using lanes on Nimitz Highway would create pedestrian-vehicle conflicts. In addition, taking away travel lanes would worsen congestion.

Life of the Land Comment 11 on the Draft EIS
At-grade operation would require a fenced right-of-way. Cross-streets and local access would preclude at-grade operation in Waipahu.

Life of the Land Comment 12 on the Draft EIS
The Project includes a station at Leeward Community College.

Life of the Land Comment 13 on the Draft EIS
The fixed guideway Project will serve Leeward Community College. Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 190 passenger boardings and 700 alightings at this station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings and Alightings, and Link Volumes, shows 3,200 daily boardings and alightings.

Life of the Land Comment unnumbered on the Draft EIS
The Project will serve Central O'ahu with feeder bus service. A future rail extension to this area is not precluded. Future bus routes and frequencies are shown in Appendix D in this Final EIS.

Life of the Land Comment 15 on the Draft EIS
The Waipio area will be served by the fixed guideway station in Waipahu. Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 1,050 passenger boardings and 350 alightings at this station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings, Alightings, and Link Volumes, shows 3,080 daily boardings and alightings.

Life of the Land Comment 16 on the Draft EIS
The Project does not serve Mililani directly via the fixed-guideway system. However, the Project does include a major transit center and park-and-ride facility at the H-1/H-2 merge (Figure 2-21, Pearl Highlands Station, in this Final EIS) that would be accessible via a direct off-ramp from H-2. Figure 3-7, A.M. Peak-Period Transit Travel Times, in this Final EIS shows that travel times would be reduced for those traveling from Mililani to Downtown using the fixed guideway system for a portion of their commute.

Life of the Land Comment 17 on the Draft EIS
There is insufficient space between the highway and private property for a rail line makai of Kamehameha Highway in this area.

Life of the Land Comment 18 on the Draft EIS
There is insufficient space between the highway and private property for a rail line mauka of Kamehameha Highway in this area.

Life of the Land Comment 19 on the Draft EIS
There is sufficient space for an elevated guideway makai of the Airport Viaduct. 'Ewa of A'olele, the Project is makai of the H-1 and Nimitz Highway interchange. Koko Head of A'olele, the alignment would have to cross over the airport access ramps, and fewer riders would be served than with the proposed alignment serving the Airport along A'olele Street.

Life of the Land Comment 20 on the Draft EIS
The Pearl Harbor Station will be served by the Project.

Life of the Land Comment 21 on the Draft EIS
Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 550 passenger boardings and 1,410 alightings at the Pearl Harbor Naval Base Station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings, Alightings, and Link Volumes, shows 5,440 daily boardings and alightings.

Life of the Land Comment 22 on the Draft EIS
There will be a fixed guideway station serving Pearl Harbor. Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 550 passenger boardings and 1,410 alightings at this station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings, Alightings, and Link Volumes, shows 5,440 daily boardings and alightings.

Life of the Land Comment 23 on the Draft EIS
The Project will serve the Hickam Air Force Base with feeder bus service. The routes are shown in Appendix D, Bus Transit Routes, in this Final EIS. This service is included in the ridership forecasting presented in the Draft and Final EISs. The service on-base is not available to the general public.

Life of the Land Comment 24 on the Draft EIS
A spur line to Hickam Air Force Base is not part of the Project. Hickam Air Force Base will be served by the Pearl Harbor Naval Base Station with feeder buses running between the fixed guideway station and the base. Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 550 passenger boardings and 1,410 alightings at this station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings, Alightings, Link Volumes, shows 5,440 daily boardings and alightings.

Life of the Land Comment 25 on the Draft EIS
Appendix B to the Final EIS shows how the rail line would access the Airport. Figure 3-10, 2030 Daily Boardings, Alightings, and Link Volumes, in this Final EIS shows daily boardings at the Honolulu International Airport Station. The line would not displace roadways or vehicles from the airport; hence security would not be affected by displacement of vehicle access. As the rail line would not affect roadway access or operations, it would not cause congestion or idling of vehicles.

Life of the Land Comment 26 on the Draft EIS
The Project connects between ʻEwa and Honolulu via the Honolulu International Airport. There is no reason to add a loop to the design.

Life of the Land Comment 27 on the Draft EIS
The Project connects between ʻEwa and Honolulu via the Airport.

Life of the Land Comment 28 on the Draft EIS
The fixed guideway system will serve Honolulu International Airport. Figure 3-9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, in this Final EIS shows 380 passenger boardings and 1,330 alightings at this station during the a.m. two hour peak period. Figure 3-10, 2030 Daily Boardings, Alightings, Link Volumes, shows 6,320 daily boardings and alightings.

Life of the Land Comment 29 on the Draft EIS
The Project is not intended to provide shuttle service within the Honolulu International Airport. Any questions about Airport plans to provide shuttle service around the airport should be directed to the Hawai'i State Department of Transportation Airports Division.

An alignment mauka of the Airport Viaduct was evaluated in the Alternatives Analysis. There is sufficient space for an elevated guideway; however, transfer of riders to the Honolulu International Airport is difficult and the alignment would attract the fewest riders of the evaluated alignments.

Life of the Land Comment 30 on the Draft EIS
According to Table 2-7, Locations and Capacity of Park-and-Ride Facilities, in this Final EIS, there will be 600 spaces at the Aloha Stadium park-and-ride facility. The travel demand forecasting model estimated projected demand at guideway stations and these estimates are for year 2030 (Table 3-22 in this Final EIS). Design for all Project stations is currently in the preliminary design stage.

Life of the Land Comment 31 on the Draft EIS
At-grade operation would require a fenced right-of-way throughout the alignment. Cross-streets and local access would preclude at-grade operation adjacent to Nimitz Highway in the Iwilei area.

Life of the Land Comment 32 on the Draft EIS
Lanes along Nimitz Highway could not be used for a rail line. One of the requirements of this Project is to operate in exclusive right-of-way. Using lanes on Nimitz Highway would create pedestrian-vehicle conflicts. In addition, taking away travel lanes would worsen congestion.

Life of the Land Comment 33 on the Draft EIS
The Project does not include a rail line to Sand Island or a park-and-ride in that area.

Life of the Land Comment 34 on the Draft EIS
Based on the cost estimate prepared for the Alternatives Analysis, a tunnel design would add between $500 million and $700 million in 2006 dollars.

Life of the Land Comment 35 on the Draft EIS
The Project terminates at Ala Moana Center and does not include fixed-guideway service Koko Head of that location.

An alignment along Ala Moana Boulevard was considered during early alternative screening and eliminated because of view and parkland impacts.

Life of the Land Comment 36 on the Draft EIS
The Project will serve the UH campus with feeder bus service transferring at Ala Moana Center. The routes are shown in Appendix D in this Final EIS. This service is included in the ridership forecasting presented in the Draft and Final EISs, Section 3.4.2, Effects on Transit.

While an alignment along the Ala Wai Golf Course it could be constructed, it would have high cost and little benefit. The proposed alignment along the Ala Wai Golf Course would fail to serve several areas of high transit demand, including Kalihi, Iwilei, Chinatown, and Downtown.

Life of the Land Comment 37 on the Draft EIS
City Council Resolution 08-261 identified the Airport Alternative from East Kapolei to Ala Moana Center as the preferred alternative. Future extensions are planned to West

Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa. Table 3-29 in this Final EIS shows that the planned extensions would increase fixed guideway ridership by approximately 25 percent in addition to 116,000 ridership estimated for the Project.

As identified in Section 2.2.2 of the Draft EIS, an enhanced bus service would be provided between the terminal stations of the Project and planned extensions of the total fixed guideway system. This includes connections between UH Manoa and Ala Moana Station. Ridership information included in the Draft EIS recognizes these bus system enhancements.

Life of the Land Comments 38 and 39 on the Draft EIS
City Council Resolution 08-261 identified the Airport Alternative from East Kapolei to Ala Moana Center as the preferred alternative. Future extensions are planned to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa. Table 3-29 in this Final EIS shows that the planned extensions would increase fixed guideway ridership by approximately 25 percent in addition to 116,000 ridership estimated for the Project. Enhanced bus service from Ala Moana Center to Waikiki would be provided until the fixed guideway extensions are implemented.

Life of the Land Comment 40 on the Draft EIS
The fixed guideway Project will provide greater transportation options. Currently, people on O'ahu can travel by private automobile, TheBus, bicycle, or walking. The fixed guideway Project will add another option. Since the fixed guideway vehicles would be completely separated from roadway traffic operations, the Project would provide substantially higher transit service reliability compared to the No Build Alternative.

Life of the Land Comment 41 on the Draft EIS
Population growth: is expected regardless of the Project being built. Because of the Project, however, more development and growth is expected around station locations. According to Section 4.19.2 of the Final EIS, the increased mobility and accessibility that the Project may provide will increase the desirability and value of land near the stations, thereby attracting new real estate investment nearby. Therefore, the Project's primary indirect effect would be to alter development near the stations, bringing higher densities than presently planned or might otherwise be developed near transit stations. These land use effects could take the form of transit -oriented development (TOD) or transit supportive development (TSD). If development occurs around stations, it is anticipated that City infrastructure would be improved in these areas.

Life of the Land Comment 42 on the Draft EIS
As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in this Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable space. No location has been identified closer to Downtown with sufficient available space to construct a maintenance and storage facility. The single Project will be constructed in phases to accomplish the following:

- Match the anticipated schedule for right-of-way acquisition and utility relocations
- Reduce the time that each area will experience traffic and community disturbances
- Allow for multiple construction contracts with smaller contract size to promote more competitive bidding

- Match the rate of construction to what can be maintained with local workforce and available financial resources
- Balance expenditure of funds to minimize borrowing

The portion of the corridor in the 'Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. Construction is planned to continue uninterrupted in the Koko Head direction from Pearl Highlands to Aloha Stadium, Kalihi, and finally to Ala Moana Center.

As portions of the Project are completed, each will be opened incrementally so that system benefits, even if limited during the initial phases, will be realized prior to completion of construction of the entire Project.

Figures 3 through -9, 2030 A.M. Two Hour Peak Period Boardings, Alightings, and Link Volumes, and Figures 3 though 10, 2030 Daily Boardings, Alightings, and Link Volumes, in this Final EIS show ridership on the Project. These figures show peak period and daily ridership totals traveling Koko Head-bound and 'Ewa bound.

Life of the Land Comment 43 on the Draft EIS
The Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the EIS. However, as mentioned in Section 4.19.2 in this Final EIS, transit-oriented development (TOD) would be expected to occur in Project station areas as an indirect effect of the Project.

The increased mobility and accessibility that the Project may provide would increase the desirability and value of land near the stations, thereby attracting 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.

Life of the Land Comment 44 on the Draft EIS
As discussed in Section 4.19.2, Indirect Effects, in this Final EIS, after completion of construction, the Project will not decrease or increase regional population or the number of jobs; however, it will influence the distribution of development.

Life of the Land Comment 45 on the Draft EIS
The Project will not change any zoning or other development rights. Questions pertaining to development rights should be directed to the Department of Planning and Permitting.

Any changes to zoning or other development rights near the stations will be determined by the City Council.

Life of the Land Comment 46 on the Draft EIS
According to Section 4.19.2, Indirect Effects, in this Final EIS, experience in other cities indicates that property sales values increase by between $60 and $2,300 for every 100 feet closer to a transit station, see Table 4-36, Rail System Benefits on Real Estate Values, in this Final EIS. The effect cannot be isolated from other market forces; therefore, the precise effect of the transit system can not be determined.

Life of the Land Comment 47 on the Draft EIS
Other transit systems in other locations are not relevant to the Project and its effects to specific historic districts located in Honolulu.

Life of the Land Comment 48 on the Draft EIS
Effects of projects built outside of Honolulu were not evaluated in this EIS.

Life of the Land Comment 49 on the Draft EIS
Section 4.8.3, Environmental Consequences and Mitigation in this Final EIS discusses shade and shadow effects of the system. According to the Federal Transit Administration's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board (TRB) Report Improving Transit Security, there was 1 serious offense for every million passenger miles carried on rail. There is a need for security on transit systems, just as there is a need for police and other security in all aspects of modern society, but there is no evidence that crime rates associated with transit are any higher than for society in general.

Life of the Land Comment 50 on the Draft EIS
The majority of the system will be located in roadway medians. It will not be enclosed in barbed wire.

Life of the Land Comment 51 on the Draft EIS
Several fixed guideway stations would be located at or near existing or planned bicycle facilities. Many bicycle lanes (planned by the City or State) could connect to fixed guideway stations. Each station would have facilities for parking bicycles, and each guideway vehicle would be designed to accommodate bicycles, as regulated by a bicycle policy. Locations where potential effects on bicycle facilities could occur are shown in Table 3-25, Summary of Potential Effects on Bicycle and Pedestrian Systems due to Fixed Guideway Column Placement, in this Final EIS.

Life of the Land Comments 52 on the Draft EIS
This comment is not related to the environmental impacts of the Project. While public involvement is an integral and essential part of the project planning process, public relations are outside of the realm of the scope of this project.

Life of the Land Comments 53 on the Draft EIS
The project team does not have information of the expenditures of other entities.

Life of the Land Comment 54 on the Draft EIS
The Project will provide high-capacity transit service between East Kapolei and Ala Moana Center with future extensions planned for West Kapolei, Salt Lake Boulevard, UH Mānoa, and to Waikīkī. The Project will connect multiple activity centers, provide cost-effective transit user benefits, and meet the Purpose and Need for the Project whether or not the planned extensions are built. Construction of the Project will not preclude future development of the planned extensions. The planned extensions will be evaluated through a separate NEPA and HRS 343 environmental review process. However, the cumulative effects analysis in Section 4.19. 2, Indirect and Cumulative Effects, in this Final EIS, includes evaluation of the planned extensions.

Life of the Land Comment 55 on the Draft EIS

Ridership projections for the forecast year of 2030 have been developed using a travel demand model calibrated and validated to current year conditions. The model is based upon a set of realistic input assumptions regarding land use and demographic changes between now and 2030 and expected transportation levels of service on both the highway and public transit system. Based upon the model and these key input assumptions, approximately 116,000 trips per day are expected to use rapid transit system on an average weekday in 2030. Since the Draft EIS, the travel demand model has been refined by adding an updated air passenger model, defining more realistic drive access modes to Project stations and recognizing a more robust off-peak non home based direct demand element based on travel surveys in Honolulu.

Ridership is projected to reach 116,000 in 2030. This figure includes over 40,000 passengers who would otherwise have had to drive on the congested roadways. The forecasts show 88,000 riders when the full system opens in 2019. Honolulu is the first project in the country to design and undertake an uncertainty analysis for this type of forecast. FTA has worked closely with Honolulu during this work effort. A variety of factors were considered in the uncertainty analysis, ranging from variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor, to the impact of various levels of investment in highway infrastructure, to the expected frequency of service provided by the rapid transit system, to park-and-ride behavior with the new system in place, and to such things as the implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles. Although the analysis will continue to be refined, the anticipated range for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day.

Life of the Land Comment 56 on the Draft EIS
This comment regarding the excise tax is not related to the environmental impacts of the Project.

Life of the Land Comment 57 on the Draft EIS
Section 4.17.6 indicates that approximately 7.4 trillion BTUs will be required to construct the system. Section 4.9.3 in this Final EIS has been updated to reflect that the Project would reduce greenhouse gas emissions for the Island of O'ahu.

Life of the Land Comment 58 on the Draft EIS
In 2030, the Project would carry 38 million passengers. Using only the passengers carried in 2030, construction energy consumption would be approximately 0.2 million BTUs per passenger carried in 2030.

Life of the Land Comments 59, 60, and 61 on the Draft EIS
The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project would have a carbon equivalence of about 20 metric tons of carbon per billion BTUs consumed (U.S. Department of Energy, Transportation Energy Data Book). Using the above values, approximately 150 thousand metric tons of carbon equivalence would be generated from construction.

Life of the Land Comments 62, 63, 64, and 65 on the Draft EIS
The energy required to construct and operate the system is presented in this Final EIS. In Section 4.11 Energy and Electric and Magnetic Fields, Table 4-20 indicates that 92,442 million BTUs will be consumed daily in 2030 to power the system, while the daily

roadway energy consumption will decrease by 2,168 million BTUs daily in 2030 as a result of the operation of the system. As shown in Table 3-18 in this Final EIS, the fixed guideway would carry approximately 116,000 persons daily. Section 4.17.6 indicates that approximately 7.5 trillion BTUs will be required to construct the system. The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project would have a carbon equivalence of about 20 metric tons of carbon per billion BTUs consumed (U.S. Department of Energy, Transportation Energy Data Book). The construction energy consumption and daily energy savings from operation can be calculated.

Life of the Land Comment 66 on the Draft EIS
The energy mix for electricity generation will depend on HECO's power production. The State of Hawai'i has established a goal of using renewable energy sources for 40 percent of electricity production by 2030. In 2007, 16 percent of energy production in Hawai'i was from renewable sources.

Life of the Land Comment 67 on the Draft EIS
As stated in Section 2. 5.2 Transit Technology, in this Final EIS, the system will be powered by electricity

Life of the Land Comment 68 on the Draft EIS
The Draft EIS identified estimated traffic volumes for Year 2030. Traffic is expected to grow with or without the Project. However, as indicated in Chapter 3, Table 3-14 of the Draft EIS (Section 3.4.1), "VMT (vehicle miles travelled), VHT (vehicle hours travelled), and VHD (vehicle hours of delay) are projected to decrease under each Build Alternative as compared to the No Build Alternative". The Final EIS shows an 18 percent decrease in VHD with the Project compared to without (Table 3-14, Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay—2007 and 2030 No Build Alternative and the Project).

Life of the Land Comment 69 on the Draft EIS
Section 4.8 in this Final EIS evaluates visual effects of the Project. It is not possible to calculate the specific number of residential units that would be affected in a particular way by the Project. Because it is an elevated guideway, views below and above the guideway would still be available.

Life of the Land Comments 70 and 71 on the Draft EIS
The transit system would provide a transportation alternative to residents. It is not planned to change the rate of population growth on O'ahu. As described in Section 4.19.2 in this Final EIS, the Project would not increase or decrease regional population or the number of jobs; however, it would influence the distribution of the development, especially near transit stations

Life of the Land Comment 72 on the Draft EIS
In the long-term, it may be appropriate to construct additional rail lines; however, Honolulu's population lives largely within a narrow corridor that is well served by a linear system.

Life of the Land Comment 73 on the Draft EIS
The transit system would provide a transportation alternative to residents. It is not planned to change the rate of growth on O'ahu.

Life of the Land Comment 74 on the Draft EIS
As detailed in Chapter 1 in this Final EIS, the Project supports the planned development of Kapolei and the 'Ewa area. Section 4.2.2, Affected Environment, in this Final EIS indicates, the 'Ewa region is a rural and agricultural area that is undergoing urbanization and includes Kapolei, which is developing as O'ahu's 'second city'. The terminal station in the west end of the Project is at East Kapolei. The west end of the Project would serve the area where both population and employment are forecasted to grow by approximately 400 percent. This growth is anticipated to occur with or without the Project.

Life of the Land Comment 75 on the Draft EIS
The Project resulting in any substantial change in agricultural self-sufficiency would be speculative. As detailed in Section 4.2, Land Use, in this Final EIS, the Project would require some farmland that is currently owned by individuals, corporations, or agencies that plan to develop them in conformance with the *'Ewa Development Plan*.

Life of the Land Comment 76 on the Draft EIS
The only farmlands that would be acquired are in the 'Ewa plain. Only a small portion of the relatively large properties would be acquired. All of the affected properties are owned by individuals, corporations, or agencies that plan to develop them in conformance with the 'Ewa Development Plan (DPP 2000).

Many of the acres considered prime, unique or of statewide importance are located at the Ho'opili site, which is one of the two options being considered for a maintenance and storage facility. The maintenance and storage facility option near Leeward Community College is the site of a former navy fuel drumming operation. This is the preferred alternative and discussions are underway with the Navy on acquiring the site. If this property is acquired for the maintenance and storage facility, the impact on agricultural lands on O'ahu will be much less than is described in the Draft EIS. Aloun farm's headquarters, located at the Ho'opili site, would not have to move. However, recognize that Aloun Farms land is leased from D.R. Horton, a developer, and is proposed for development in the future.

Life of the Land Comment 77 on the Draft EIS
As detailed in Section 4.11 in this Final EIS, total transportation energy consumption would decrease as a result of the Project. Combined with the State of Hawaii's commitment to renewable electricity production, the system would substantially reduce the consumption of petroleum and therefore improve energy self-sufficiency.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under the National Environmental Policy Act and acceptance in this Final EIS by the Governor of the State of Hawai'i are the next anticipated actions, and will conclude the environmental review process for the Project.

Very truly yours,

WAYNE Y. YOSHIOKA

Director