



DEPARTMENT OF THE NAVY

COMMANDING OFFICER
NAVAL STATION
850 TICONDEROGA ST STE 100
PEARL HARBOR HI 96860-5102

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Ser N00/028
05 FEB 2009

CERTIFIED MAIL NO. 7007 3020 0002 3044 3834

Mr. Wayne Yoshioka, Director
Department of Transportation Service
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project. These comments supplement initial comments provided in our December 17th 2008 letter.

Navy's status should be changed from Participating Agency to Cooperating Agency based on our jurisdiction by law and our special expertise related to the use of Navy lands both within and outside the Pearl Harbor area and along the proposed corridor alignments. As stated in our December 17th letter, Hickam Air Force Base (AFB) and Naval Station Pearl Harbor will join to form Joint Base Pearl Harbor - Hickam in 2010. As such, issues discussed in this letter and accompanying enclosures can be expected to apply to Hickam AFB and related housing areas.

In addition to concerns raised in our December 17th letter, Navy requires a complete understanding of Navy and Air Force properties needed for the corridor alignment. Although the DEIS discusses reduction of Navy road widths and land acquisition at Nimitz Field, Richardson Field, Navy-Marine Corps Golf Course, and Makalapa Branch Medical Clinic, we have not been provided a detailed listing of the full scope of Navy and Air Force properties along the entire corridor alignment. Request the City and County of Honolulu (CCH) provide Navy a letter listing all Navy and Air Force properties required, including detailed drawings and property lines, for all alternatives considered. This will allow Navy to fully understand the scope and breadth of impacts and to provide guidance related to those properties.

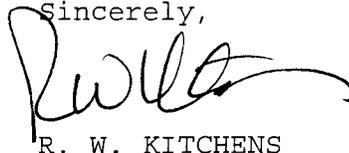
Associated general concerns and specific DEIS comments, along with a site location map of Halawa Landing, are provided as enclosures (1) and (2) to this letter. As a result of the many issues associated with the transit corridor proposal and potential impacts to Navy and Air Force properties, Navy has assembled a team of subject matter experts to address areas such as real estate, security, family

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housing, utilities, fuels, hazardous waste and cultural resources. This will assist in the coordination required between Navy and the City in our role as a Cooperating Agency.

We look forward to continued dialogue throughout this process. Should you have any questions, please contact my Public Works Officer, CDR Lore Aguayo, at (808) 471-2647 or e-mail maria.aguayo@navy.mil.

Sincerely,



R. W. KITCHENS

Enclosures (2)

Copy to:

COMNAVREG HI (N3, N4, N9)

FISC PH (Code 700)

HICKAM AFB (15 CES/CEV - R. Lanier)

NAVFAC HI (ARE1, EV, OPHAM, OPHAM1GW, PRP)

PACFLT (N01CE)

PHNSY&IMF (Code 900 - D. Webber)

**U.S. NAVY ADDITIONAL COMMENTS ON THE HONOLULU HIGH-CAPACITY TRANSIT
CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)**

(These comments supplement Navy comments of December 17th 2008)

General Comments / Concerns:

1) Navy and Air Force land acquisition. Appendix B of the DEIS reflects a number of Navy-owned lands in the Pearl Harbor area that are identified as being required for the Honolulu High-Capacity Transit Corridor Project. A determination must be made by the Navy as to whether those identified lands can be made available for City and County (CCH) use from a security, operational and legal standpoint. This will require that CCH submit an official letter identifying each parcel (Navy and Air Force) and requesting Navy's comments on the acquisition of those parcels for the Corridor Project. If property can be made available, fee conveyance to CCH would likely be in the best interests of the Navy for liability and administrative reasons. Certain properties may not be available as they have security or operational issues or are encumbered under existing long term agreements to other parties. As noted in our December 17th letter, the process for land acquisition from the Navy requires at least nine months.

Recommend that the DEIS include a discussion that reflects that the acquisition of Federal lands differs from the acquisition of privately owned lands.

2) Impacts to Navy utilities. Identification and any necessary relocation of Navy utilities including high-voltage power lines and underground utility lines will require extremely close coordination with the Navy. We are particularly concerned about water, sewage, and high-voltage electrical lines. No Navy sewer lines run along either alignment (Salt Lake and Airport routes), but several lines run perpendicular to these routes, including a major 18" line from Camp Smith that crosses Salt Lake Boulevard in the auxiliary Stadium (triangle) Parking area. The airport alignment contains several sewer crossings, including one area where an 18" sewer parallels Kamehameha Hwy near the Federal Fire Department area. Water lines run along both Salt Lake Boulevard and along Kamehameha Highway near the Post Office. High voltage lines run parallel to Moanalua Terrace. Of note, abandoned Navy fuel lines exist along the proposed corridor route. Navy cannot guarantee lines are completely empty because of potential water intrusion into these lines over time. Navy will not be responsible for any potential releases from these lines during the course of construction.

3) Impacts to Navy roadways and traffic patterns adjacent to Navy property. Wear-and-tear on Navy roadways from increased traffic to-and-from transit corridor stations and park-and-ride

Enclosure (1)

facilities will result from implementation of any of the build alternatives. Further, Navy believes that traffic pattern impacts will likely result from construction of the Park and Ride facilities and transfer stations. For example, although the Draft EIS states that no effects will be realized at the intersections surrounding the Aloha Stadium Park and Ride, Navy believes that residents entering and exiting Ford Island to and from Kamehameha Highway will, in fact, realize impacts from the additional 600 spaces planned at the Aloha Stadium Park and Ride directly across from the Admiral Clarey bridge (access to Ford Island). We request further mitigation discussions with the City for: (1) roadway maintenance related to those roadways affected by this proposal; (2) traffic congestion near Park and Ride facilities and transfer stations.

4) Noise impacts to Navy housing areas: Although Section 4.9 of the Draft EIS does not specify noise impacts to Navy housing areas, Navy would like to discuss CCH's plans for further mitigation of noise impacts to Navy housing areas, both during construction and during rail operation. Navy recognizes that the Draft EIS discusses implementation of noise-blocking parapet walls and wheel skirts; however, Navy remains concerned about the cumulative noise impacts to Navy housing areas adjacent to Kamehameha Highway, Nimitz Highway, and Salt Lake Boulevard. Navy encourages maximum use of sound absorptive materials in the track area to reduce noise impacts to ambient levels.

5) Construction impacts. All construction adjacent to Navy and Air Force properties and housing areas requires close coordination with the Navy, to include laydown and equipment yards, road closures, utility outages, etc. Navy requests that CCH minimize construction impacts to personnel transiting to and from Pearl Harbor-Hickam and to those living in military housing areas.

6) Impacts to Navy permits. Close coordination is required with Navy related to any impacts from the proposed build alternatives to existing Navy permits, particularly utilities (water and sewer) and drainage permits. Navy is concerned about quality and quantity of drainage and Navy permit effects resulting from corridor construction and from the corridor itself.

7) Security concerns including proximity to Pearl Harbor Naval Station fenceline and housing / parking impacts. The Draft EIS does not specify the transit corridor height and lateral distance from the Pearl Harbor Naval Station fenceline for the Airport and Airport/Salt Lake build alternatives. Further, unauthorized parking and increased vehicular and foot traffic will likely increase around transit corridor stations for the various build alternatives, including the Aloha Stadium Station and Park and Ride, the Arizona Station, the Pearl Harbor Station, and the Ala Liliko'i Station. We request further mitigation discussions with

the City to discuss: (1) appropriate platform height and stand-off distances from the Pearl Harbor Naval Station fence line to ensure adequate Station security; and (2) CCH plans for security and prevention of unauthorized parking in Navy family housing areas and areas adjacent to Pearl Harbor Naval Station, including Halawa landing (Arizona Memorial and museums, Richardson Center Complex, Rainbow Bay Marina, Dry Boat storage, and Oahu Concepts).

8) Integration of public transportation with transit corridor stations. The Draft EIS does not elaborate on the integration of other public transportation systems with the transit corridor. Depending on the time of day, the corridor will run every three, six, or ten minutes. Navy is specifically interested in how other forms of public transportation will integrate with the transit corridor schedules and ultimately transport riders to and from their originating or final destinations, including: (1) Navy and Air Force employment concentration areas (e.g., Pearl Harbor Naval Shipyard); (2) Navy and Air Force housing areas; and (3) Military shopping areas. Further, Navy is interested in discussion of impacts resulting from changes to the public transportation system as it integrates with the transit corridor.

9) Hazardous waste and materials and Installation Restoration (IR) sites. Information contained in DEIS Section 4.11, Hazardous Waste and Materials, requires revision for accuracy as it relates to Navy properties. Specific comments are provided below. Additionally, several IR sites exist along the proposed transit alignment. Navy requires a detailed review of the proposed alignment for 1) subsurface oil monitoring wells, and 2) an underground storage tank (UST) site at the golf course. The DEIS does not contain enough information to determine the potential impacts to Navy property for the western portion of the transit line. Specific information for restoration areas around the Pearl Harbor main complex is provided in the "Specific Comments" section below.

10) Potential Impacts to Navy fuel distribution system. Based on information contained in the DEIS, it appears that the transit line construction may impact the Navy's fuel distribution system as it will be adjacent to a major Navy fuel storage and distribution system. Close coordination with the Fleet Industrial Supply Center (FISC) will be required.

11) Impacts to Archaeological, Cultural, and Historic Properties. Any specific undertakings affecting Navy eligible historic properties require consultation with the Navy. Specific requirements are provided below.

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Specific Comments:

1) Section 4.5 Neighborhoods: 4.5.3, p. 4-45, Aliamanu-Salt Lake description states, "Except for certain areas, Navy allows the general public to drive through these areas, and many motorists travel to and from Kamehameha Highway and the H-1 Freeway." This statement is misleading as these roadways and the roadways through the Navy housing areas near the airport are not specifically intended as main roadways for the general public. Navy currently retains the ability to close these Navy roads under certain security postures. Navy is concerned about increased roadway maintenance related to implementation of any of the proposed alternatives in the DEIS. Navy would like to further discuss with CCH appropriate mitigation measures for direct and indirect effects to certain Navy roadways resulting from implementation of any of the build alternatives.

2) Section 4.11 Hazardous Waste and Materials:

a) 4.11.1, 2d paragraph. Requires slight revision. Hazardous Waste (HW) is primarily regulated by Department of Health (DOH) Solid and Hazardous Waste (SHW) Branch, Hawaii Administrative Rules (HAR) 11-260 series. The HEER Hazard Evaluation & Emergency Response (HEER) group is a mirror of the Comprehensive Environmental Response Compensation & Liability Act (CERCLA) and is responsible for release response of HS Hazardous Substance (HS)/petroleum and cleanup of sites associated with past releases of HS/petroleum. There is a distinction of HW regulation under Resource Conservation and Recovery Act (RCRA), which is the responsibility of the SHW Branch and not the HEER group.

b) 4.11.2, Military Uses, 1st paragraph, 2d sentence. The National Priority List (NPL) site is erroneously referred to as Pearl Harbor Naval Station. The correct NPL site designation is Pearl Harbor Naval Complex.

c) 4.11.2, Military Uses, 1st bullet. Requires clarification. Navy still retains portions of property at the former Naval Air Station Barbers Point (NAS BP). The Navy retained portion of the NAS BP is under Navy jurisdiction and not Hawaii Community Development Authority (HCDA) jurisdiction as noted in the DEIS.

d) 4.11.2, Military Uses, 2 bullet. Refer to the NPL designation comment, Pearl Harbor Naval Station. The NPL is also identified as the former Navy Drum site and active Navy base. The former Ewa Drum facility is not a Navy base and has been closed under the State Contingency Plan (SCP). DOH provided Navy a concurrence letter on the closure of the former Ewa Drum facility. The Installation Restoration (IR)

site of the former Ewa Drum facility is referred to as "Fleet Industrial & Supply Center (FISC) 27 Ewa Junction Motor Gasoline (MOGAS) Spill."

e) 4.11.2, Military Uses, Ranked "1" bullet. Refer to the NPL designation comment, Pearl Harbor Naval Station. Please provide rationale for including this information, as the proposed transit corridor is outside of the borders of the Pearl Harbor Naval Complex. The road systems within the transit corridors are controlled by the State of Hawaii and CCH.

f) 4.11.2, Military Uses, page 4-112, last paragraph, last sentence. The draft EIS needs to clearly state the former Ewa Drum site has been closed under the SCP.

g) 4.11.3, Environmental Consequences, Common to All Build Alternatives, 2d column, 1st paragraph, 3d bullet. Please clarify the connection between fluorescent light tubes and vehicle components. Vehicles use lithium, halogen, and/or incandescent bulbs.

h) Additional IR Site information:

i) Subsurface Oil: The identified proposed transit line runs adjacent to an existing subsurface oil plume. Estimated limits of the plume nearest Kamehameha Highway area of tank 54 are within 200 feet of Kamehameha Highway. Navy also operates monitoring wells just inside of the fence line along the highway.

ii) Near the Halawa Landing area: The nearest IR site to the proposed rail route would be the Inactive Petroleum Pipeline at Halawa Landing. The area of known petroleum contamination is approximately 400 ft west of Kamehameha Highway (located in the parking lot area approximately 200 ft east of the Bowfin Museum). The approximate site location is shown on the attached map titled CTO61.

iii) Near the area of the golf course: Northern alignment of the Airport Viaduct route is near several former IR sites (mainly transformer sites) and a current IR site: UST NS-29. UST NS29 is at the corner of Building A-19.

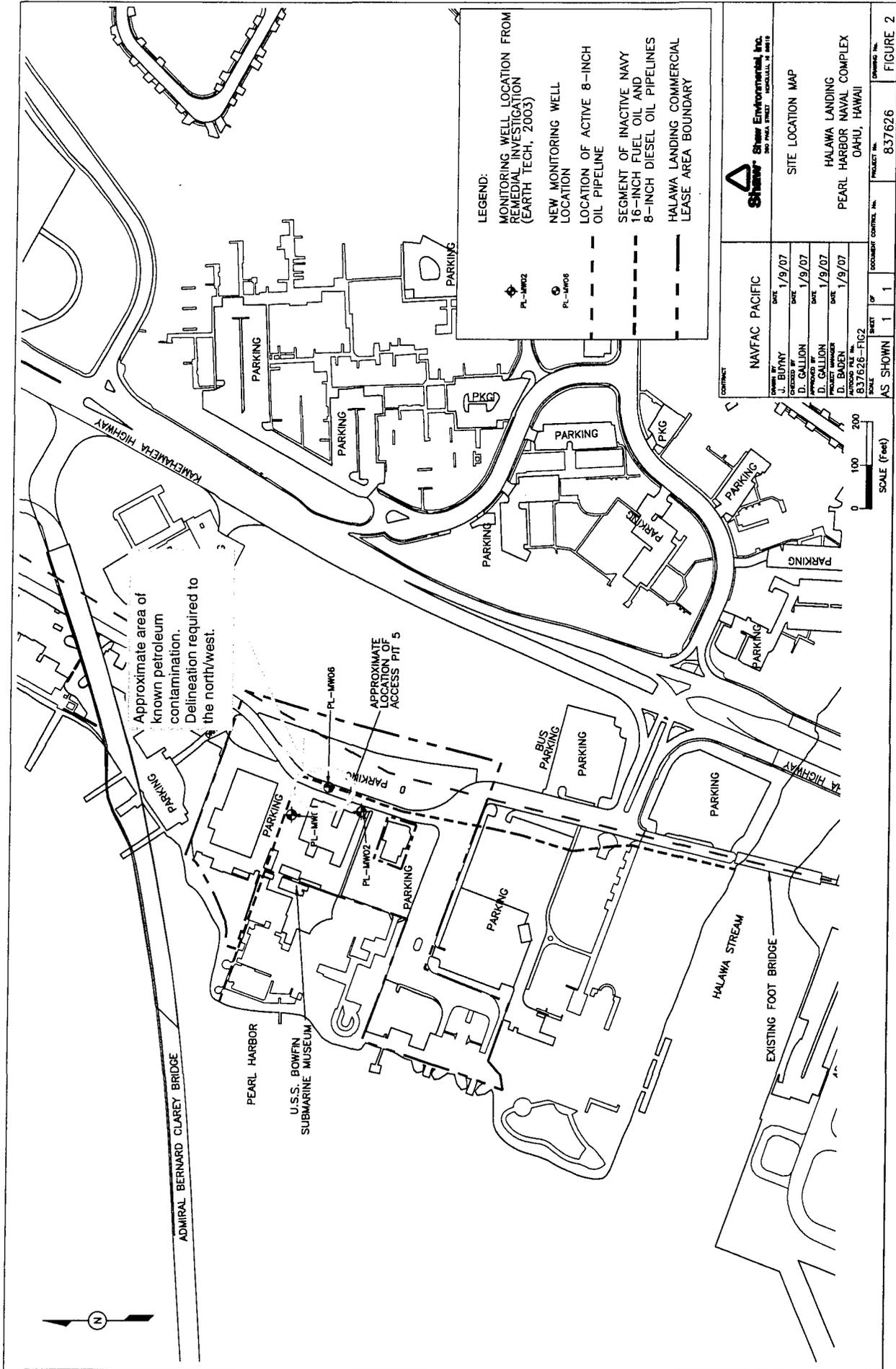
3) Section 4.15 Archaeological, Cultural, and Historic Resources: Any identification of or undertakings affecting a Navy eligible historic facility requires consultation with the Navy. Specific requirements include:

a) CCH will need to consult the Navy during the execution of the specific undertakings affecting Navy properties containing eligible historic assets. This includes Navy review and

coordination during the planning and design phases of each undertaking.

b) The Navy as a Federal Agency retains authority for the identification of eligible historic properties on Navy land. As such, CCH should consult with Navy during identification of potentially eligible Navy historic properties along and adjacent to the proposed transit corridor.

c) CCH will need to consult with Navy regarding the assessment of the Area of Potential Effect on historic properties for all undertakings, inclusive of all other requirements under the National Historic Preservation Act of 1966, and as amended.



ENCLOSURE(2)