Errata-Appendix A

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
FINAL ENVIRONMENTAL IMPACT STATEMENT

Errata File

This errata file is provided to you to correct errors in Appendix A of the Final Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project related to responses to comments received during the public comment period of the Draft EIS (November 8, 2008 through February 6, 2009). This errata file has been provided to those on the distribution list in the Final EIS, including federal, state and local agencies as well as public recipients. In all cases, the correct response letters were mailed or emailed to the agency and public commenters.

Revisions include:

1. **Extra page in response letter included in Appendix A – Extra page deleted**

Some letters included an extraneous page in the response letter. The correct letters, consistent with those mailed, are included in the errata file as follows:

Federal
District Court - Honorable Barry Kurren
District Court - Mark Hanohano

Individuals
Harry Huyler

2. **Incorrect version of letter included in Appendix A – Updated version of letter added**

These letters showed an incorrect date and, in some cases, minor changes in content. The correct letters, as mailed or emailed to recipients, are included in this errata file.

State Agencies
Department of Hawaiian Home Lands – Honorable Micah Kane
Office of Hawaiian Affairs - Clyde Namuo

City and County of Honolulu
Honolulu Police Department – Louis Kealoha

Individuals, Groups, and Organizations

Arakaki, Evelyn
Avenido, Mary
Barker, Audrey
Bremer, David
Brown, David
Burbage, Lora
Cargas, Jake
Celshall, Emika
Chu, Michael
Colon, Guillermo
Custer, Jonathon
D.R. Horton - Uchida

Del Rio, Albert
Estep, William
Fernandez, Eddielyn
Follmer, William
Genadio, Frank
Ha, James
Hamm, Gerhard
Hasenyager, Shirley
HECO - Tomita
Hebshi , Aaron
Kilthau, Bob
Lamon, Matt
Meier, Kathleen
Mitchell, J
Mori, Richard
Moyen, Dale
Naea, Samoa
O'Donnell, Gary
Pa, Florita
Pazaglia, Lance
Ridings, John
Smith, Kenny
Smith, Pam
Taheny, Ted
Timpson, Steve
Tuia, Veronica
Weissmann, Dan
Yoshida, Ken
Anonymous Resident

3. Responses missing from Appendix A – Response letters added

The following letters are included in this errata file; however, the response letters were mailed to the recipients listed.

State Agencies
University of Hawaii – Panos Prevedouros

Individuals, Groups, and Organizations
Elizabeth Sataraka

Transcripts
Bob Loy

4. General placement issues

Several response letters were inserted in the wrong location in Appendix A. The following changes are included in this errata file:

- The Kamehameha Schools response letter appeared in the wrong location; it has been placed correctly at the end of the corresponding submittal letter.
- The Life of the Land response letter originally appeared after the Taulagi Leano letter in Appendix A; it has been placed correctly at the end of the corresponding submittal letter.
- The UltraSystems response letter appeared in the wrong location; it has been placed correctly at the end of the corresponding submittal letter.
- Deleted duplicate Cheri Michel letter that appeared after Clifford Mercado letter in Appendix A.
- Deleted duplicate Buzz Hong letter that appeared after the Nancy Hedlund letter in Appendix A.

Federal Agencies

The following letters included an extraneous page in the response letter shown in Appendix A. The correct letters, consistent with those mailed, are included in the errata file as follows:

- District Court - Honorable Barry Kurren
- District Court - Mark Hanohano

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT11/08-288564R

The Honorable Barry M. Kurren, Magistrate Judge
U.S. District Court
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Judge Kurren:

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

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

The City has received documents from the U. S. General Services Administration (GSA) related to the security needs of the Federal Building. Representatives from the Project's Safety and Security Department have met with GSA and Court staff to address security concerns on October 16 and November 10, 2008, and on February 3 and March 31, 2009, and will continue to work with GSA staff on security concerns. The Project has 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. A safety and security plan is being developed for the Project, which will take into account the unique security concerns of the Federal Building.

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. 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.

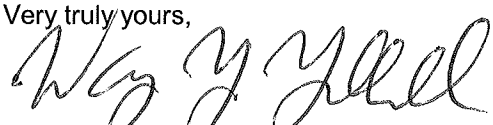
An elevated system on either Beretania Street or King Street would run in front of either the State Capitol or Iolani Palace and would require removal of traffic lanes. The Ala Moana Boulevard to Pohukaina Street alignment was eliminated during the project screening process partially because the alignment would cross a substantial portion of the Federal Building property.

As indicated above, representatives from the Project's Safety and Security Department will continue to work with GSA staff on security concerns and will ensure that the project design meets the applicable Courthouse security requirements.

The Court's concern with explosive attacks is noted. DTS is working with the GSA to determine security requirements and ensure that the project design meets the requirements.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-297221R

Mr. Mark M. Hanohano
U.S. Marshall for the District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850-0400

Dear Mr. Hanohano:

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

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

Since the publication of the Draft EIS, DTS has coordinated directly with the U. S. General Services Administration (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, 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.

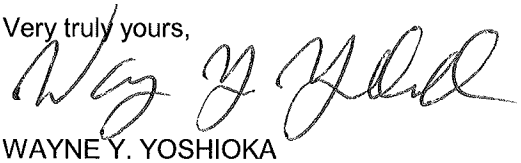
The City Council received the letter provided by the Courts. It was forwarded to DTS Rapid Transit Division, for response in the Final EIS.

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 Capitol 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.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

State Agencies

The following letters showed an incorrect date and, in some cases, minor changes in content. The correct letters, as mailed to recipients, are included in this errata file as follows:

- Department of Hawaiian Home Lands – Honorable Micah Kane
- Office of Hawaiian Affairs - Clyde Namuo

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299031R

The Honorable Micah Kane, Chairman
Department of Hawaiian Home Lands
State of Hawaii
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Chairman:

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

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

Each station will have a secured public restroom. Patrons will ask the station attendant for access to the restroom. As discussed in the Final EIS Section 2.5.4 Safety and Security Measures, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety hazards and security vulnerabilities of the system. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Honolulu Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and will be part of implementing the plan. The plan addresses public safety and security concerns, including threats and hazards associated with the Project, specific

issues that were identified through community outreach efforts, and design and architectural details to enhance safety.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the 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. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

As described in Section 4.19.3 Cumulative Effects, current land use plans anticipate extensive development of the Ewa plain irrespective of whether or not the project is built. Thus, the project may have the effect of intensifying land use in the areas near the planned stations; however, the overall development plan will not be substantially altered by the Project. The State of Hawaii prepared an Environmental Assessment (EA) of the effects of two major transportation projects, the North-South Road and Kapolei Parkway) in the Ewa area. The evaluated growth-inducing and cumulative impacts of the projects under the Hawaii Environmental Policy Act, see EA § 3.15.4.

The Ewa Development Plan (DPP 2000) strives to designate some areas for dense development while preserving other areas for agriculture.

Access to park-and-ride lots associated with the future extension projects would be designed as part of the project development process for each extension.

The traffic impact of park-and-ride lots is discussed in Section 3.4.3 in this Final EIS. Traffic impacts are projected at six intersections near the East Kapolei, UH West Oahu, Pearl Highlands, and Ala Moana Station areas. Section 3.4.7 presents measures to mitigate these impacts. Traffic conditions with the planned mitigation are identified in Table 3-23, .

The acquisition of land for a maintenance and storage facility is addressed in Section 4.17, in this Final EIS. Section 4.4, in this Final EIS, describes the process for land acquisitions associated with the Project, including land for the maintenance and storage facility.

Figures 4-9 through 4-12, depict existing facilities.

The East Kapolei 1 Development is included in the development assumptions.

Department of Hawaiian Home Lands' support of the Project and support of the West Kapolei extension with a Kapolei Parkway Station is noted.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298689R

Mr. Clyde W. Namuo, Administrator
Office of Hawaiian Affairs
State of Hawaii
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

Dear Mr. Namuo:

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

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

Public Hearings for the Draft EIS

All five Public Hearings on the Draft EIS were scheduled for two hours each. Though the Public Hearing Officer's section of hearing oral testimony from the public closed prior to the end of the meetings because of lack of public comment, the Public Hearing Officer stayed through the entire two-hour scheduled Hearing and would have been able to reconvene the Hearing if requested by a member of the public wishing to provide comment. In addition, individuals were able to speak with a court reporter to make official comments and/or place written comments into the record for the entire two-hour time period the Hearing was scheduled for. Thus, the public was allowed to offer comments for the entire two hours that were allotted and advertised to the

public. In addition, comments were accepted on the website and in writing through February 6, 2009.

Archaeological, Cultural, and Historic Resources

FTA has extended an invitation to OHA to be a concurring party to the Programmatic Agreement (PA).

The PA prepared for this Project is included as Appendix H, Section 106 of the National Historic Preservation Act Programmatic Agreement, in this Final EIS. OHA has been a consulting party throughout the Section 106 process and has been requested to provide input to the process at several points during the process. OHA was invited to and participated in consultation meetings related to development of the PA under Section 106.

Archaeological site investigations will be conducted pursuant to the PA and described in Section 4.16 of the Final EIS. It will include survey plans, survey and coordination. SHPD will be consulted throughout the process.

Pursuant to Hawaii Revised Statutes Chapter 6E, work will stop and SHPD would be contacted at the time of discovery of any iwi kupuna or native Hawaiian cultural or traditional deposits. The City will notify OHA and other interested parties of the discovery and any action taken.

Natural Resources

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 an 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.

Section 4.13, Ecosystems, of this Final EIS explains that the Project will not adversely affect protected migratory waterbirds. Hawaii's waterbirds and migratory birds have adapted to multi-lane elevated freeways with thousands of automobiles, buses, tractor trailers, traveling at random intervals, at a rate that is 10-20 mph faster than the train, see Section 4.13.3, Environmental Consequences and Mitigation [Ecology], in this Final EIS.

As Hawaii's waterbirds and migratory birds have adapted in the past as discussed above, it is, therefore, reasonable to expect that the birds would adapt over time to a fixed rail train that travels at a slower rate of speed (50 mph) than current traffic.

FTA has concluded Section 7 consultation. Appendix F of the Final EIS includes consultation correspondence, including correspondence with the USFWS. The USFWS did not express concern about seabird attraction.

No endangered species have been identified on either of the evaluated maintenance and storage facility sites.

Contaminated Sites

If the Project has to acquire or be built on contaminated property, the contamination will be remediated within the construction limits. The Project will not perform long-term biological and chemical monitoring as that responsibility resides with the responsible party, as described below. Further guidance is included in FTA Circular 5010.1D, which will be followed for the Project. This guidance provides:

"Contaminated Property (including Brownfields). Appropriate due diligence concerning contamination is conducted as a part of the NEPA process and before selection of a contaminated property in a capital project is considered.

Appraisals may consider contamination in determining the market value of the property. The terms, "contamination" and "hazardous material" are interpreted broadly to include all contaminants that can affect property value.

(a) The legal responsibility for hazardous material clean-up and disposal rests with parties within the property title chain and with parties responsible for the placement of the material on the property. Grantees must attempt to identify and seek legal recourse from those potentially responsible parties or substantiate the basis for not seeking reimbursement.

(b) During the NEPA process, the grant applicant will have considered not only the estimated project cost of appropriate remediation (remediation being any action, developed in consultation with appropriate regulatory agencies, to reduce, remove or contain contamination), the applicant will also have considered and taken action regarding the short and long-term liabilities associated with Brownfields, if applicable.

(c) To encourage the complete assessment of contamination prior to Project decision-making, FTA generally will not participate in the remediation of contamination discovered during construction.

(d) The grantee should contact FTA for technical assistance regarding contaminated property."

Stormwater

As noted, the Permanent Best Management Practices (BMPs) Plan will describe practices to be included as part of the Project to address stormwater quality before the water is discharged to streams or existing storm drain systems. The BMPs will promote a natural, low-maintenance, sustainable approach to managing and increasing stormwater quality.

Permanent BMPs, such as bioretention areas, vegetated buffer strips, dry swales, water quality basin, and structural BMPs with oil/water separators will be considered, as needed, during the park-and-ride site and the maintenance and storage facility design process. Selection of permanent BMPs will be site-specific and may be modified as a result of geotechnical data collection during final design.

The discussion of permanent BMPs has been revised in the Final EIS, Section 4.14.3, Environmental Consequences and Mitigation [Water]. As stated in this section, pollution prevention BMPs, such as regular inspection and cleaning of the drainage system, will need to be a part of the stormwater management plan that will be developed during Final Design. Permanent BMPs will be implemented for the maintenance and storage facility and the park-and-ride facilities. Permanent BMPs will also be installed for stormwater that drains from the guideway at all crossings of waterbodies. In some instances, the discharge of stormwater from the guideway may increase stormwater inflow to some waters as a result of rainfall collecting on impervious surfaces where infiltration currently occurs. However, because stormwater quality is not expected to be adversely affected, no streams or downstream marine waters would experience negative effects. Stormwater runoff will be filtered through landscaped median areas and sedimentation collars where possible. Stormwater will be filtered through specially designed bioinfiltration units near water bodies on the HDOH 303(d) list of water quality-limited segments (specifically Sites 4, 12, 18, and 19). In locations where space does not allow for their use, downspout filters will be installed on drains near impaired waters (Sites 7 and 30).

Permanent BMPs will be installed as part of the Project to address stormwater quality before the water is discharged to streams or existing storm drain systems. The BMPs will promote a natural, low-maintenance, sustainable approach to managing and increasing stormwater quality. At a minimum, all stormwater downspouts from the guideway will include erosion control BMPs and energy dissipation devices to prevent any scour of landscaped medians. An integral part of the permanent BMPs will be an inspection and maintenance plan to ensure that the BMPs operate as designed. The Project will consider the use of permeable paving materials in locations where runoff would not be polluted.

Pearl Harbor National Wildlife Refuge and Wetlands

No endangered species have been identified on either of the evaluated maintenance and storage facility sites. As the Project will not adversely affect endangered species, no alternatives have been evaluated. The environmental consequences of the Project, including at the proposed maintenance and storage facilities, are presented in Section 4.13.3 of the Final EIS.

The Army Corps of Engineers Section 404 permit triggers the need for Department Of Health's Clean Water Act, Section 401 Water Quality Certification for the Project.

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 that the State's anti-degradation policy (HAR, Section 11-54-1.1) will be complied with. Permanent BMP's to protect water quality include vegetated swales, retention ponds, and grit removal structures; these are discussed above and in full detail in Section 4.14.3 of the Final EIS.

A large detention basin is proposed for the Leeward Community College Maintenance and Storage Facility Site, the preferred Maintenance and Storage Facility Site. The detention basin will overflow via a new 60-inch drain to the shore of Pearl Harbor at Middle Loch. This site is assigned to a Category IVB because nearshore waters supported, until recently, a mangrove forest. To meet avoidance alternative minimization requirements, structural elements of the drain will not be placed in waters of the U.S. The system will have a permanent oil/water/sand separator prior to the outfall, and any discharge entering Pearl Harbor will meet water quality requirements for the estuary. See Figure 4-63 in Section 4.14.2. Impacts will be limited to infrequent flows generated by large storms. These treated flows will contribute fresh water to the Loch. However, Pearl Harbor is considered to be an estuary because of the restricted exchange with the Pacific Ocean through a narrow mouth, and the substantial freshwater flows from a number of contributing springs and streams draining southern Oahu.

Energy

Future generation of electricity from renewable sources will enable the Project to provide additional reduction in fossil fuels. As a worst-case analysis, the Final EIS evaluates a future scenario where all electricity is generated from fossil fuels. Even in this scenario, fuel consumption islandwide would be lower with the Project in place compared to No Build conditions.

LEED (Leadership in Energy and Environmental Design) standards will be followed for the maintenance and storage facility. There are no applicable LEED standards for the guideway. Where LEED classification is not available, the principles of the U.S. Green Building Council will be followed during the design and construction of the Project to include items such as recycling materials, instituting a waste management plan, use of fly as in concrete, and using Low-VOC paints and coatings, and many others. Integration of photo-voltaic cells into stations and other project features could reduce net project electricity demand. The Project will incorporate other sustainable design measures, such as the use of native plants. While the Project is not regulated by HRS Chapter 196-9 requirements, DTS supports the intent of the statute by providing an efficient and sustainable system.

Environmental Justice Concerns

There is no reasonable alternative to displacement of the Banana Patch community. DTS has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by DTS staff to discuss the Project, and potential relocation assistance.

A special community meeting was held at the Alpha Omega Christian Fellowship Church. Invitations were sent to each Banana Patch community household. At this meeting, a brief presentation was given on the Project and public testimony was recorded by a court reporter. A transcript is included in Appendix A of this Final EIS.

DTS will continue to work with individual property owners to provide relocation services. As stated in this Final EIS in Section 4.4.3, "Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably." As a whole, the community cohesion is typical of a set of neighbors and is not a particularly tight-knit.

Signage as a Tool for Preservation

As described in the Section 106 PA that is included as Appendix H to the Final EIS, the Project will document and provide cultural context for resources in the study corridor.

Visual and Aesthetic Concerns

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft 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 mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *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.*
- *Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape

design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The City and County of Honolulu is conducting workshops with communities where rail stations are proposed. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents to contribute ideas about the appearance of station entryways in their neighborhood. Ideas generated at the workshops will be incorporated into the station planning process.

A landscaping plan has been outlined in the Final EIS in Section 4.8.3 to mitigate visual effects of the Project, including utilization of native plants, and replacement of trees and lost vegetation as appropriate.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

State Agencies

The following letter was inadvertently left out of Appendix A; however, the response letter was mailed to the recipient:

- University of Hawaii – Panos Prevedouros

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT2/09-298706R

Mr. Panos Prevedouros
University of Hawaii at Manoa
Department of Civil and Environmental Engineering
2540 Dole Street, Holmes Hall 383
Honolulu, Hawaii 96822-2382

Dear Mr. Prevedouros:

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

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

(1) Traffic Analysis Methodology

A technical team evaluated potential approaches for intersection analysis. The team included DTS traffic engineers and traffic engineering consultants each with over 30 years of experience. DTS reviewed the approach with the City and State departments with expertise in traffic modeling, including the Department of Planning and Permitting (DPP) and the Hawaii Department of Transportation (HDOT). Through that process, it was determined that the most appropriate approach to analyzing intersection level-of-service (LOS) in the H-1 corridor was the use of the Highway Capacity Manual (HCM) methodology applied in the SYNCHRO software for the reasons listed in the following paragraphs in this subsection of your comment letter. This method has been used on similar projects, including Crenshaw/Prairie Transit Corridor Study

(Los Angeles, CA), Salvation Army Hawaii Kroc Center Traffic & Parking Management Plan (Honolulu, HI), and the KRC/Kalakaua Affordable Housing Development (Honolulu, HI).

It should be noted that all LOS methodologies have their advantages and disadvantages. The HCM methodology is considered state-of-the-practice when assessing traffic impacts and is appropriate for verifying the effect of proposed mitigation measures on the transportation system on the Project. The HCM methodology provides a high level of confidence in the reporting of observed and forecast traffic conditions in the study area when identifying potential impacts or deficiencies of a roadway system.

The HCM methodology considers various characteristics of the roadway network, including signal timing plans, intersection geometry, vehicle and pedestrian movements, and storage bay lengths. Other conventional methodologies, such as Intersection Capacity Utilization (ICU) and Circular 212, do not account for parameters such as signal timings and the multi-modal nature of this corridor. HCM reports the delay experienced by vehicles traveling through an intersection and determines intersection operating conditions for varying ranges of delay. In congested areas and on roadways with closely spaced intersections, the HCM methodology employed in the SYNCHRO software considers upstream and downstream operations (i.e., queuing effects that extend from one intersection to the next). Queue lengths can be estimated for each turning movement to better model the actual traffic operating conditions to ascertain whether queuing extends between locations.

HCM is also the basis for the analysis of unsignalized intersections, of which there are 46 in the study corridor. Other methodologies, such as ICU and Circular 212, are not applicable for unsignalized intersection analysis. Using HCM for both types of intersections allows for a consistent approach to the analysis across the entire corridor.

The traffic analyses for the Draft and Final EISs, using the HCM methodology, did not conclude that all corridors in the study area are oversaturated. It is clear that some intersections are operating at oversaturated conditions, but this does not occur consistently across the study corridor. The locations of oversaturated conditions are generally isolated intersections. The only corridors that appear to be oversaturated based on this analysis are portions of the H-1 and H-2 Freeways. While the HCM methodology has limitations, under certain specialized circumstances it works well for corridor-level analysis. Where the prospect of saturated conditions was found, such as at major transit center stations, further analysis was performed using micro-simulation models to evaluate more detailed conditions. Hence, the use of the HCM methodology is appropriate for the arterial-level intersection analysis conducted in this study. The results from the use of the HCM methodology provide an accurate representation of the potential traffic impacts that result from the Project.

(2) Peak Hour Screenline Level-of-Service Methodology

The LOS methodology used in the Draft EIS for the screenline facility analysis was based on the application of accepted and established national standards: (1) 2000 HCM (Transportation Research Board, 2000); and (2) roadway LOS thresholds adapted from Quality/Level-of-Service Handbook (Florida Department of Transportation [FDOT], 2002). The FDOT Handbook is based on information from the 2000 HCM.

The methodology used in the Draft EIS combines traffic volumes, roadway classification, speed, density, and peak-hour factors, and produces a LOS value based on projected peak-hour volumes. The LOS was calculated by comparing traffic volumes on a roadway facility to the saturated volume LOS thresholds for each individual facility. The resulting LOS is an accurate reflection of existing and future operations on the H-1 Freeway. The Draft EIS was designed to present a summary of the Project's effect on the transportation system. The detailed analysis of volumes and roadway capacity for each analyzed facility is provided in Tables 3-9 and 3-10 in the Final EIS.

(3) Forecasts

The process followed in developing travel forecasts is consistent with consultation with FTA for projects of this type. The concern about S-shaped growth is inconsistent with current practices for forecasting travel and in particular in Honolulu where there is ample room for future growth in the Ewa Plain and even in Kakaako along with multiple plans in place for such growth to occur. The land use data used are from the sources (OahuMPO and DBEDT) that define the City and State policies for growth and were adopted by the Oahu Metropolitan Planning Organization (OahuMPO) Technical Advisory Committee to be used by the OahuMPO in defining needed long-term transportation plans. Changes to reflect new information or improved forecasting techniques are part of the ongoing effort to develop the best possible forecasts of travel on the island so as to accommodate future ridership and vehicular traffic as effectively as possible. All alternatives studied in the Alternatives Analysis Phase were evaluated with the same version of the travel forecasting model. Section 3.2 of the Final EIS describes changes made since the Draft EIS was published to further improve the model's forecasting ability.

(4) Localized Traffic Analysis at and near Stations

Detailed traffic analyses were completed for all station areas that are expected to generate heavy vehicular traffic as well as increases in bus, park-and-ride, and drop-off and pick-up activity. The effects of the Project and the required mitigation in these areas are shown in Sections 3.4.3 and 3.4.7 of the Final EIS, respectively.

(5) Project Extensions

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.

Since selection of a first project by City Council Resolution 07-039, project information has detailed the limits of the Project and illustrated other areas that were included in the Long-Range Plan as future or planned extensions. The future extensions are discussed in the cumulative impacts sections of Chapters 3 and 4 of the Final EIS. The comment suggests presenting an evaluation of an action that is not proposed for implementation, which as stated above, is not required to be evaluated under Chapter 343 of the Hawaii Revised Statutes and of NEPA.

The City has shown in information materials provided on the Project, including information presented at public meetings and public hearings, that the Project is 20-miles of the full Locally Preferred Alternative and that planned extensions would be built when funding becomes available. Additional environmental documentation will be prepared when the extensions are considered for implementation.

(6) No Build Assessment of ORTP 2030 Congestion Relief Projects

The travel forecasting completed for the Project was accomplished under consultation with the FTA. All projects in Table 2-4 of the Final EIS are included in the network and have been properly evaluated as part of the No Build and Build Alternatives. Population and employment projections were obtained from the City and County of Honolulu, Department of Planning and Permitting.

Travel time on the fixed guideway from the Iwilei Station to the East Kapolei Station will only take 36 minutes. This travel time will be consistent and reliable, regardless of conditions on surrounding roadways. The fixed guideway system is planned to operate with two- or three-car trains with a capacity of between 325 and 500 passengers each. At three-minute headways during the peak period, that provides capacity for over 8,500 passengers per peak direction per peak hour. This figure applies in both directions for a total system capacity of over 17,000 passengers per peak hour. The full capacity of the fixed guideway with four-car trains and 90-second headways is over 25,000 passengers per hour per direction, or over 50,000 passengers total. With the PM zipper lane, once a vehicle leaves the zipper lane or Nimitz Flyover, that vehicle is still subjected to congestion on surrounding roadways. The zipper lane suffers disruptions from congestion and collision delays like any other part of the highway system. Such disruptions are much less likely on the fixed guideway.

(7) TOD Potential

Traffic studies conducted for the Draft and Final EISs considered additional vehicle and bus traffic generated by fixed guideway stations. That analysis is contained in Section 3.4.3 of Chapter 3 of the Final EIS. Measures also are identified in Section 3.4.7 of the Final EIS to mitigate traffic effects at the Pearl Highlands Station. In addition, the FTA Noise and Vibration Manual (2006 edition), which was used in the NEPA analysis of the Project, focuses on existing noise levels and existing land uses. The effect of the Project on air quality in Honolulu is presented in Section 4.9 of the Final EIS. There are no identified hot spots associated with the station areas that require additional carbon monoxide analysis.

The analysis of direct impacts of the Project is focused on construction and operation of rail transit service. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented

development (TOD) is expected to occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near stations, thereby attracting new real estate investment nearby (in the form of TOD). Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting under a process covered by the City's new TOD Ordinance 09-4.

(8) University Avenue

As stated previously, the Project terminates at Ala Moana Center and does not extend to the UH Manoa campus. Any future extensions will be evaluated prior to implementation. 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.

(9) Ala Moana Station

The plan for the Ala Moana Center Station was shown on Sheet RP024 in Appendix A of the Draft EIS and will be included on the same sheet in Appendix B of the Final EIS. The line marked "future extension" will not be constructed as part of the Project and has been deleted in Appendix B of the Final EIS to eliminate confusion. Detailed design has not been completed for extensions beyond Ala Moana Center, but planning-level design would have the guideway continue to follow Kona Street, then transition to Kapiolani Boulevard prior to Mahukona Street.

There is no plan to demolish the station at Ala Moana. Some service will continue to rely on the Ala Moana Station even after the line is extended to UH Manoa. Furthermore, the extension has not yet been designed. Any future extension, including to UH Manoa, will be thoroughly evaluated prior to implementation.

(10) Double Track by Aloha Stadium

The third track near the Aloha Stadium Park-and-Ride allows for vehicle bypass, temporary train storage, and other operating contingencies, such as staging trains for a major event at Aloha Stadium. The additional track was shown in detail in Appendix A of the Draft EIS and is included in the Project's cost estimate and in Appendix B of the Final EIS.

(11) Pearl Harbor Tunnel

A Pearl Harbor Tunnel was evaluated by the OahuMPO during preparation of the 2030 Oahu Regional Transportation Plan (ORTP). It was rejected from the project list, but included in the 2030 ORTP as an illustrative project, with a cost estimate of $7 billion in 2005 dollars. The ORTP states that the illustrative project could prove beneficial as a transportation improvement, but that 2030 revenue projections could not support inclusion of the projects in the ORTP. Illustrative projects are not considered a part of the officially endorsed regional transportation plan. Any concerns with the cost estimation for projects associated with the ORTP should be directed to the OahuMPO, as it is not a City agency and is not directly related to the environmental review and planning process for the Project.

(12) Federal Funding

The plan, as described in the Final EIS, is to begin construction as soon as possible using local funds prior to the execution of a Full Funding Grant Agreement (FFGA) with the FTA. This will ameliorate the effects of cost escalation that would occur if the start of the Project is delayed. The New Starts funding program requires multiple steps to be complied with as the Project develops, but it also allows for construction activities to begin prior to the approval of a FFGA (the final commitment of funds from the FTA). Locally funded work can take place subject to a Letter of No Prejudice (LONP) to preserve the federal project financing structure. The City will seek an LONP once the Record of Decision (ROD) is approved. The New Starts process also allows some limited pre-construction activities such as utility relocation and property acquisition once the ROD is issued before the FFGA. The FTA may contribute up to $1.55 billion subject to the process being completed. The City's local match using General Excise Tax Surcharge revenues will comprise about 70 percent of the total cost. That is a high local match compared to most projects of this type and strengthens the City's case for federal funding by improving the financial rating for the Project.

(13) DEIS Base Travel Times

The results provided in the comment are similar to data shown in Figure 1-10 in the Final EIS, which presents a 75-minute average highway drive time between Waianae and Downtown. As stated in Section 1.2 of the Final EIS, travel times in Table 1-1 Final EIS are modeled door-to-door. The numbers in Figure 1-10 and Table 1-1 in the Final EIS are identical to those in the Draft EIS.

The Nimitz Viaduct is part of State improvements to the highway system and, accordingly, was included in the transportation modeling conducted for 2030 No Build and Project conditions. Effects of the Nimitz Flyover on traffic conditions in 2030 are discussed in Section 3.4.2 of the Final EIS. Travel on the Nimitz Flyover was included for the following travel pairs under the No Build and Build Alternatives: Kapolei to Downtown, Ewa to Downtown, and Mililani to Downtown. As shown in Figure 3-7, the Nimitz Flyover does improve transit travel times with the No Build Alternative between certain travel pairs (e.g., between Mililani and Downtown) compared to 2007 conditions. However, as also shown in this figure, travel times improve substantially more with the addition of the Project.

According to Table 3-16 in the Final EIS, transit travel time via fixed guideway from the Honolulu International Airport Station to the Downtown Station will take 12 minutes.

(14) Transport of Rail Cars to Rail Yard

Rail vehicles will be delivered from the port to the yard by truck. Final vehicle assembly will be completed on-site. The transportation of rail cars to the rail yard is outside the scope of the NEPA process for the Project, which is why the issue was not addressed in the Draft EIS nor the Final EIS.

(15) Rail Travel Times

The 50-54 minute travel time referred to in the Draft EIS is a door-to-door time. As stated in Section 3.4.2 of the Final EIS, Figure 3-7 represents the time required to complete a trip from origin to destination and assumes that at least a portion of the trip will be made on the fixed guideway system. These times are door-to-door and include walking and transfers.

The 40 minute travel time provided in the eight-page mailing sent in October 2008 corresponds to Table 3-16 in the Final EIS, which reflects travel time from station-to-station on the fixed guideway system. For the sake of accuracy, the Ala Moana station is only three stations from downtown.

(16) TheBus Inventory

The information contained in Table 3-12 of the Transportation Technical Report is from the National Transit Database for the 2007 Reporting Year based on data provided by DTS. It is the source for most transit information and compiles information provided by each transit property. The table includes the number of seats for each vehicle category. Information on passenger capacity has been added to Addendum 3 of the Transportation Technical Report.

Buses taken out of service are those that are scheduled for preventative maintenance in addition to those involving unanticipated accidents and repairs. FTA Circular 9030.1C provides guidance regarding the maximum number of buses that should be included within the inventory for preventative maintenance and unanticipated repairs, which is 20 percent of the total fleet.

As stated in FTA Circular 9030.1C, "Urbanized Area Formula Program: Grant Application Instructions," chapter V, paragraph 9.a.5, discusses spare ratio policies as follows:

> *"5. Spare Ratio Policies. Spare ratios will be taken into account in the review of projects proposed to replace, rebuild, or add vehicles. The basis for determining a reasonable spare bus ratio takes local circumstances into account. The number of spare buses in the active fleet for grantees operating 50 or more revenue vehicles should not exceed 20 percent of the number of vehicles operated in maximum service."*

The 20 percent spare ratio guidance is consistent with the actual numbers experienced by TheBus. The City reported 439 buses were required for maximum service operation for reporting year 2009. The City also reported 531 active vehicles which would be available for service. An additional 19 vehicles were recorded for a total of 549 vehicles in the fleet (at the

time of data submission to NTD) resulting in a 20 percent spare ratio.

Eighty-five percent (85%) of the in-service articulated buses are assigned from the base to the high passenger volume rapid bus and trunk routes including Routes A, 2 and 42. Ten articulated buses are currently assigned from the base to peak period, express routes. Following the completion of the express route trips those ten buses are then placed into service on the high passenger volume routes.

(17) TheBoat

The information for TheBoat inventory on page 3-31 of the Transportation Technical Report (as also appears on page 3-7 in the Draft EIS) has been revised in Addendum 02 to the Transportation Technical Report and Chapter 3 of the Final EIS to reflect that two boats provided service with a third boat available as a spare. TheBoat was listed under existing transportation conditions in these two documents. However, TheBoat service was discontinued after the Draft EIS and Transportation Technical Report were released. Additionally, both the Final EIS and Addendum 02 to the Transportation Technical Report have been revised to state that service for TheBoat was discontinued in July 2009.

Because analysis of TheBoat is not part of the Project evaluated in the EIS, congestion reduction and productivity associated with TheBoat were not analyzed. (TheBoat was part of the system at that time as an alternative mode. Descriptions of the existing transit network are provided in Section 3.2 of the EIS, including TheBus, TheHandiVan, TheBoat, and private services). Ridership forecasts for the Project consider ridership on TheBoat which, in general, has not attracted ridership from the areas likely to be served most effectively by the fixed guideway. In July 2009, the City discontinued TheBoat as a cost-cutting measure. The ridership data attributable to TheBoat were minor and did not have any substantial impact on the results of the traffic model (less than 100 trips per day on TheBoat were predicted in 2030 with the Project). Most passengers likely switched to TheBus when TheBoat was discontinued.

(18) Fares

The City Council's current policy is to recover between 27 and 33 percent of annual operating costs from the farebox. The policy does not address recovering capital costs from the farebox. That is a typical practice among most transit systems in the U.S. If the operating costs rise over time, presumably the City Council would increase fares to maintain the 27 to 33 percent level of recovery. The fixed guideway portion of future transit system operating costs is estimated at about 25 percent of the total transit system operating cost. Capital costs are partially covered by the FTA's New Starts program that can fund up to about 50 percent of the capital cost of a project subject to meeting certain requirements through a successive set of refinements as the project development moves from planning through design. At each step, the FTA uses third party consultants to review the work on the Project to ensure it is being done using realistic costs and procedures and that it shows how uncertainties will be covered should they occur. The culmination of these steps is a FFGA, approved by Congress, which commits a specified level of funding to the project.

(19) Hoopili

The Hoopili reference is unrelated to the evaluation of the fixed guideway. It is a separate project with its own set of objectives despite showing similar results. Any comments on the Hoopili development project should be directed to the proposer of that project.

The commenter is correct in that conditions on the highway will be worse in 2030 under any circumstances and regardless of whether the fixed guideway or any other transportation option is implemented. The key comparison is that the Project will improve conditions compared to what they would be in 2030 if the rail project were not built. As shown in Table 3-14 in the Final EIS, with the fixed guideway system, total islandwide congestion (as measured by vehicle hours of delay) will decrease by 18 percent compared to the No Build Alternative. In addition, traffic volumes were studied at various screenlines in the study corridor. The travel demand forecasting model was used to forecast traffic volumes at these screenlines in 2030, both with and without the Project (Tables 3-9 and 3-10 in the Final EIS). Analysis revealed that traffic volumes at these screenlines will decrease up to 11 percent with the Project, meaning the same number of people will be carried in fewer vehicles. Accordingly, traffic conditions will be better with the fixed guideway than with the No Build Alternative.

(20) Forecasts from the OahuMPO Model

20.1) The forecasts presented in the Draft and Final EISs were prepared using the 2002 OahuMPO travel demand forecasting models as a basis, updated with refinements as described in the Honolulu High-Capacity Transit Corridor Project Model Development, Calibration, and Validation Report (RTD 2009k), and the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Results and Uncertainties Report (RTD 2009l).These reports are available on the project website (www.honolulutransit.org) or from DTS.

20.2) That element of the OahuMPO travel demand forecasting models, which is used to forecast travel by visitors, was developed using data from a 1991 survey of visitors to Oahu. That survey included questions about visits to a set of 25 visitor destinations. These destinations included Dole Cannery Square and Kodak Hula Show/Waikiki Shell. The commenter is correct in that the nature of these destinations has changed since the time of the visitor survey. As a result, the visitor model has been updated to reflect changes that are more recent. The details of that update are discussed in the Model Development, Calibration, and Validation Report in the supporting information to this Final EIS.

20.3) Experience with modeling suggests that a micro-simulation model is inappropriate for a regional application because it is designed primarily for operational analyses of highways, as well as being extremely time-consuming and costly to apply. Most importantly, it does not guarantee any better results and offers many more opportunities for error and misinterpretation. The OahuMPO travel forecasting model was developed and has been updated and refined, consistent through consultation with FTA. FTA has reviewed the model and its results throughout the Project and is satisfied that it performs appropriately. The trip purposes mentioned in the comment are typical of regional modeling trip-making and are used in models throughout the world.

The coefficient values for each of the key variables in the mode choice model that were developed for the OahuMPO travel demand model were based upon national experience and were consistent with FTA guidance and recommended best practices. The model was carefully calibrated and validated using on-board rider survey data obtained in 2005 for the entire TheBus system. The final set of alternative-specific constants was based entirely upon ridership behavior and patterns exhibited by passengers using TheBus. There were no adjustments made to the model that would favor a fixed guideway system.

All best practice travel-demand models consider a range of trip purposes. The Oahu models stratify resident travel by 11 trip purposes:

- *Journey-to-Work – Home-Based Work*
- *Journey-to-Work – Home-Based Non-Work*
- *Journey-to-Work – Work-Based Non-Work*
- *Journey-to-Work – Non-Home-Based, Non-Work-Based*
- *Journey-at-Work – Work-Based*
- *Journey-at-Work – Non-Work-Based*
- *Non-Work-Related – Home-Based College*
- *Non-Work-Related – Home-Based K-12 School*
- *Non-Work-Related – Home-Based Shopping*
- *Non-Work-Related – Home-Based Other*
- *Non-Work-Related – Non-Home-Based*

Examples of these trip purposes are described as follows:

- *A person leaves home and goes to work (Journey-to-Work – Home-Based Work)*
- *A person leaves home heading toward work and stops at the dry cleaner (Journey-to-Work – Home-Based Non-Work)*
- *This person continues on and then stops for a coffee (Journey-to-Work – Non-Home-Based, Non-Work-Based)*
- *This person continues on and reaches work (Journey-to-Work – Work-Based Non-Work)*
- *A person leaves work and goes to lunch (Journey-at-Work – Work-Based)*
- *This person continues on to shop (Journey-at-Work – Non-Work-Based)*
- *This person then returns to work (Journey-at-Work – Work-Based)*
- *A person leaves home and goes to college (Non-Work-Related – Home-Based College)*

- *A person leaves home and goes to high school (Non-Work-Related – Home-Based K-12 School)*

A full range of trip purposes is required to adequately address the complete spectrum of travel decisions and resulting patterns.

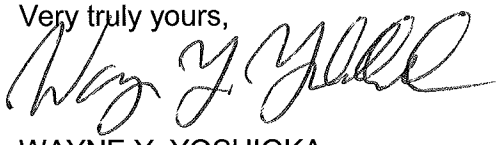
20.4) An understanding of the travel forecasting model suggests that while there are assumptions that are used in the development of forecasts, they are unrelated to travel times that are the subject of the comment. Travel times are determined within the model itself. Based on assigned free-flow speeds and commonly accepted capacities for various roadways (both of which have been derived over time from empirical studies), the model develops travel times in an iterative fashion as traffic moves from one path to another through successive iterations to find the path that minimizes travel time between a given origin and destination pair (avoiding links in the system that have traffic volumes in excess of capacity when possible). The resulting travel time is the time the model uses to determine total trip travel time. This, in turn, determines one of the criteria in determining the likelihood of a trip taking transit, using a particular roadway, taking the bus, etc.

There is no travel time "used" to make transit work better. Times are developed internally in the model based on primarily empirical inputs. Moreover, the travel forecasting model is developed with direct oversight of the FTA in accordance with consultation with them. The Honolulu model has been closely reviewed by the FTA.

It is also worth noting that the model applies the same capacity-travel speed approach to all modes in calculating travel times. For example, the same input information and modeling practices were used for the Managed Lane Alternative in the Alternatives Analysis. This is the currently accepted practice for New Starts modeling and has worked effectively on many recent highway and transit projects.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

City and County of Honolulu

The following memorandum was shown with an incorrect date and, in some cases, minor changes in content. The correct memorandum was sent to the recipient, and is included in this errata file.

- Honolulu Police Department – Louis Kealoha

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-291203R

MEMORANDUM

TO: LOUIS M. KEALOHA, CHIEF
HONOLULU POLICE DEPARTMENT

FROM: WAYNE Y. YOSHIOKA, DIRECTOR

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

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

The Honolulu Police Department's continued participation regarding safety and security planning is noted.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

WAYNE Y. YOSHIOKA

Enclosure

Individuals, Groups, and Organizations

The following letter included an extraneous page in the response letter shown in Appendix A. The correct letter, consistent with the one mailed, is included in the errata file as follows:

- Huyler, Harry

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330584

Mr. Harry Huyler
147 Oko Street
Apartment 3
Kailua, Hawaii 96734

Dear Mr. Huyler:

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

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

Per your first comment, The Honolulu Advertiser published an article on November 10, 2008, which evaluated the voting patterns in the results for the Project.

Regarding your second comment as to the cost of the Project, as noted in Section 6.5 of the Final EIS, the Honolulu High-Capacity Transit Corridor Project Summary Cash Flow Tables (RTD 2009g) present the year-by-year cash flow tables for the Project. They are available as support documents to the Final EIS along with other technical reports.

To answer your third comment, both the Airport and Salt Lake Alternatives were carried forward in the Draft EIS. No alignment had been selected at that time. The City has since identified the Airport Alternative as the Project. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As

compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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 proposed 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 this Final EIS. However, 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 the National Environmental Policy Act (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 this 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.

Lastly, business proponents consist of the Hawaii Business Roundtable and several other business groups that have voiced support for the Project. Information on campaign contributions may be obtained from the State of Hawaii Campaign Spending Commission. Questions regarding plans for future development by private groups should be directed to the groups in question. Aside from the secondary and cumulative effects described in the Final EIS, such development is not part of the Project proposed in this EIS.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Individuals, Groups, and Organizations

These letters showed an incorrect date and, in some cases, minor changes in content. The correct letters, consistent with those mailed or emailed are included in this errata file.

Arakaki, Evelyn
Avenido, Mary
Barker, Audrey
Bremer, David
Brown, David
Burbage, Lora
Cargas, Jake
Celshall, Emika
Chu, Michael
Colon, Guillermo
Custer, Jonathon
D.R. Horton - Uchida
Del Rio, Albert
Estep, William
Fernandez, Eddielyn
Follmer, William
Genadio, Frank
Ha, James
Hamm, Gerhard
Hasenyager, Shirley
HECO - Tomita
Hebshi , Aaron
Kilthau, Bob
Lamon, Matt
Meier, Kathleen
Mitchell, J
Mori, Richard
Moyen, Dale
Naea, Samoa
O'Donnell, Gary
Pa, Florita
Pazaglia, Lance
Ridings, John
Smith, Kenny
Smith, Pam
Taheny, Ted
Timpson, Steve
Tuia, Veronica
Weissmann, Dan
Yoshida, Ken
Anonymous Resident

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336272

Ms. Evelyn Arakaki
91-030 Amio Street
Ewa Beach, Hawaii 96706

Dear Ms. Arakaki:

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

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

The island's unique visual character and scenic beauty were considered in the visual and aesthetic analysis presented in Section 4.8 of the Final EIS. It is acknowledged that the guideway and stations will noticeably contrast with smaller buildings and change the character of some areas. In addition, some views Downtown and in the other areas, including protected views, will be blocked and some views will change substantially. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where the project elements will be near existing views or in the foreground of these views. Viewpoints not located near the alignment or stations will generally be less affected by changes in the visual environment because they will take in a longer, more expansive landscape.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

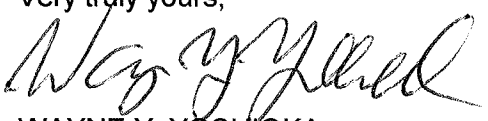
- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *Consult with the communities surrounding each station for input on station design elements.*
- *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.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The Project will provide users, including tourists, with expansive views from several portions of the corridor by elevating riders above highway traffic, street trees, and low structures adjacent to the alignment. In Section 4.8.3 of the Final EIS, specific environmental, architectural, and landscape design criteria are listed that will help minimize visual effects of the Project.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334410

Ms. Mary Avenido
91-1027 Kaikoele Street
Ewa Beach, Hawaii 96706

Dear Ms. Avenido:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330555

Ms. Audrey Barker
(No address or e-mail provided)

Dear Ms. Barker:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has

been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

With the Airport Alternative, tourists and residents will benefit by having more transportation options. Table 3-13 in the Final EIS shows daily person transit trips by purpose, broken down for residents and visitors. As seen in this table, transit trips for both groups increase with the addition of the Project compared to the No Build Alternative. Daily resident person trips by transit increase 24 percent with the Project compared to without the Project while daily visitor person trips by transit increase 19 percent with the Project compared to without the Project in 2030.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330992

Mr. David Bremer
bremerd001@hawaii.rr.com

Dear Mr. Bremer:

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

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

Regarding your inquiry concerning the proposed Leeward Community College Station, while sections of Waikele, Waipahu, and Seaview are less than one mile, in a straight line, from the Leeward Community College Station, the network of highways and interchanges that separate these neighborhoods from the station makes it difficult to provide pedestrian, bicycle, or even auto or bus access from that area. It is more likely that residents of these neighborhoods will use the nearby Pearl Highlands Station to access the rail system. In addition, parts of Waipahu are within walking distance of the West Loch and Waipahu Transit Center Stations. Bicycle parking will be provided at all stations and will offer another option where it is too far to walk generally beyond one-half mile of the rail station. Also, many residents in these neighborhoods may find it more convenient to use a feeder bus route to reach the nearest station. Finally, a park-and-ride facility will be constructed at the Pearl Highlands Station, providing yet another access option.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330585

Mr. David Brown
4170 AIT Taipei Place
Dulles, Virginia 20189

Dear Mr. Brown:

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

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

Your preference for the Salt Lake Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

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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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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WAYNE Y. YOSHIOKA
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010 RT10/09-336268

Ms. Lora Burbage
rustyblades63@yahoo.com

Dear Ms. Burbage:

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

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

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the 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. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*

- *Balance expenditure of funds to minimize borrowing.*

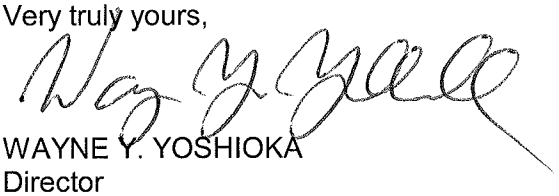
The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. 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.

The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332252

Mr. Jake Cargas
chrysler_87@yahoo.com

Dear Mr. Cargas:

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

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

The design and construction of the approximately 20-mile transit Project is highly complex and will be developed in segments. The first segment of the Project is expected to be operational in 2012, as shown in Figure 2-42 of the Final EIS.

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the 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. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*
- *Match the rate of construction to what can be maintained with local workforce and available financial resources.*
- *Balance expenditure of funds to minimize borrowing.*

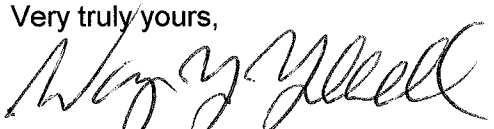
The portion of the corridor in the Ewa direction of Pearl Highlands is less developed than the areas in the Koko Head direction. Right-of-way can be obtained more quickly at the west end of the Project; therefore, overall project construction can begin earlier, resulting in lower total construction costs. 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.

As also discussed in Chapter 2 of the Final EIS, park-and-ride lots are planned at East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium. These stations have been identified as having the highest demand for drive-to-transit access.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330441

Ms. Emika Celshall
emikab@yahoo.com

Dear Ms. Celshall:

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

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

The Project is in exclusive elevated right-of-way, which will only accommodate rail vehicles. Providing additional bicycle facilities is beyond the scope of this Project. However, the Project is being carefully designed so it does not preclude future bicycle facilities from being built along routes where they are planned.

Many bicycle lanes planned by the City or State could connect to fixed guideway stations. The Oahu Bike Plan is currently being updated by DTS and is scheduled to be adopted in 2010. The Draft Master Plan includes a prioritized list of bicycle projects developed using criteria that include access to transit. Several projects that would connect existing or future bicycle facilities to rail transit stations are included in the Draft Master Plan. Additional information on the Oahu Bike Plan is available at http://www.oahubikeplan.org.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project

website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330550

Mr. Michael Chu
126 Queen Street
Apartment 306
Honolulu, Hawaii 96813

Dear Mr. Chu:

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

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

Conversion of existing land use to transportation use refers to any land not currently part of transportation right-of-way that will become part of the overall transportation system. This includes, for example, right-of-way needed for the rail guideway, park-and-ride facilities, stations, and the maintenance and storage facility. The EIS is intended to satisfy NEPA requirements and discloses impacts to the natural and built environment. Within this process of documentation, land use changes due to the Project are disclosed. Amendments to existing land use plans are at the discretion the City and County of Honolulu.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332350

Mr. Guillermo Colon
95-123 Hamumu Place
Mililani, Hawaii 96789

Dear Mr. Colon:

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

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

As described in Chapter 2 of the Final EIS, the site near Leeward Community College has been identified as the preferred location for the maintenance and storage facility. This site is the closest to the Downtown area that meets the site requirements for this facility.

Bicycles will be allowed on trains, as regulated by a bicycle policy to be developed. In addition, the luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers. No change to bicycle and luggage policies on TheBus is proposed at this time.

Regarding your question on potential hazardous material issues with the traction power substations, there should be no hazardous material issues. The traction power substations will be secured within a locked building. They will not be accessible to the public.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332335

Mr. Jonathon Custer
5747 Dorothy Drive
San Diego, California 92115

Dear Mr. Custer:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-296992R

Mr. Dean Uchida, Vice President
D.R. Horton, Schuler Division
828 Fort Street Mall, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Uchida:

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

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

The number and percent of total transit trips has been added to Table 3-3 and Table 3-12 in the Final EIS.

Table 3-19 in the Draft EIS (Estimated Transit User Benefits Resulting from 2030 Build Alternatives) represents information extracted from the OahuMPO Travel Demand Forecasting Model. This table has been updated in the Final EIS (now appearing as Table 3-17). The information is still from the Travel Demand Forecasting Model.

The Travel Demand Forecasting Model used for the Project reflects population and employment numbers anticipated with the development of Hoopili, UH West Oahu campus, Kroc Center, and the De Bartolo project. However, based on FTA guidance, the model cannot account for the benefits resulting from transit-oriented development or increases in land use as a

result of the fixed guideway project. Daily person trips and vehicle miles traveled for the No Build Alternative forecast travel patterns without the fixed guideway system.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-337451

Mr. Albert Del Rio
1245 Maunakea Street, #212
Honolulu, Hawaii 96817

Dear Mr. Del Rio:

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

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

The overall public information program has been continuous since the beginning of the Project in 2005. Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process. The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management

(TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07 001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

The City held five public hearings in December 2008 throughout the study corridor. Both City and consultant employees were available to answer questions. Attendees were given the opportunity to make official comments on the Project by providing testimony to the Public Hearing Officer (which was recorded by a court reporter), giving a private statement to a court reporter, or submitting their comments in writing. More information concerning the public hearing process can be found in Chapter 8 of the Final EIS.

In "Chapter 2 – Alternatives Considered" of the Alternative Analysis Report, November 2007, as well as in Chapter 2, Alternatives Considered, of the Final EIS, two options were considered for the Managed Lane Alternative—Two-direction and Reversible. This alternative would have provided a two-lane elevated toll facility between Waipahu and Downtown Honolulu, with variable pricing strategies to maintain free-flow speeds for transit and high-occupancy vehicles (HOVs)." The Two-direction Option would have served express buses operating in both directions during the entire day. To maintain free-flow speeds in the Two-direction Option, it may have been necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would have been allowed to use the facility for free, while single-occupant and two-person HOVs would have had to pay a toll. The Reversible Option was found to be optimal.

The findings are summarized in Chapter 2 of the Final EIS as follows: The Managed Lane Alternative was evaluated for its ability to meet project goals and objectives related to mobility and accessibility, supporting planned growth and economic development, constructability and cost, community and environmental quality, and planning consistency. While this alternative would have reduced congestion on parallel highways, system-wide traffic congestion would have been similar to the No Build Alternative as a result of increased traffic on arterials trying to access the facility. Total islandwide vehicle hours of delay would have increased with the Managed Lane Alternative compared to the No Build Alternative, indicating an increase in systemwide congestion (Table 2-1, Final EIS).

The Managed Lane Alternative would not have supported planned concentrated future population and employment growth because it would not have provided concentrations of transit service that would have served as a nucleus for transit-oriented development. The Managed Lane Alternative would have provided little transit benefit at a high cost. The cost-per-hour of transit-user benefits for the Managed Lane Alternative would have been two to three times higher than that for the Fixed Guideway Alternative. Similar to the TSM Alternative, the Managed Lane Alternative would not have had substantially improved service or access to transit for transit-dependent communities. No funding sources were identified for the Managed Lane Alternative. Toll revenues from the Managed Lanes Alternative would have paid for

ongoing operations and maintenance while remaining revenues would have been used to repay debt incurred to construct the system.

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

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

Various highway improvements have been considered for Oahu. The State of Hawaii Department of Transportation, which is responsible for the freeway system, has evaluated needs for the freeway system and identified the highway projects that would be most efficient at reducing congestion on Oahu. The projects are listed in Table 2-4 of this Final EIS and included in the analysis for all project alternatives. Broad island-wide transportation approaches were reviewed by the OahuMPO during the development of the 2030 Oahu Regional Transportation Plan (ORTP). The selection of a fixed guideway transit system began with that planning process.

Existing and future transit populations are not neglected. As stated in Section 1.2 of the Final EIS, 63 percent of Oahu's population and 80 percent of employment are located within the study corridor. By 2030, these distributions will increase to 69 percent and 83 percent, respectively.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. The OahuMPO model is based on "best practices" for urban travel models in the U.S. and consistent with consultation with the FTA. The model is updated approximately every five years to reflect changes in land use, socio-economic conditions, and transportation network improvements. The model is approved by the OahuMPO Technical Advisory Committee. 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 the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air

passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

Figures 3-9 and 3-10 in the Final EIS present revised ridership numbers for each fixed guideway station. As shown in Figure 3-9, between 650 and 820 passengers will exit the fixed guideway system at each station between Kalihi and Iwilei during the a.m. two-hour peak period. In addition, 840 passengers will exit the system at Kakaako during the a.m. two-hour peak period.

Similar alignments following North and South King Streets were evaluated in the Alternatives Analysis and would have resulted in less transit use than the Project. While an alignment on South King Street would have served some areas beyond walking distance to project stations, it would not have served several areas of dense development, including Chinatown, Downtown, Kakaako, and Ala Moana Center, and would have resulted in fewer overall transit-user benefits. The South King Street alignment had low ridership and served the fewest number of residences and employment areas of all the alignments studied in the downtown area. In addition, it would not have offered good connections for a future extension to Waikiki. The North King Street alignment was rejected because it impacted a greater number of historical properties and cultural practices, had higher capital costs, had greater noise impacts than the Dillingham Boulevard alignment, and was inefficient to connect to the Airport or Nimitz Highway near Chinatown. Vineyard Boulevard was ruled out during the screening process because it was located farther from commercial and employment areas.

As noted in Section 2.5.6 of the Final EIS, bus service will be enhanced and the bus network will be modified to coordinate with the fixed guideway system. Some existing bus routes would be altered or eliminated to reduce duplication of services provided by the fixed guideway system. Buses removed from service in the study corridor would be shifted to service in other parts of the island. Future bus routes and frequencies are shown in Appendix D in the Final EIS.

As stated in Chapter 2 of the Final EIS, a park-and-ride facility will be located at Pearl Highlands Station near where the H-1/H-2 Freeways merge. In addition, Central Oahu will be served by enhanced bus service connecting to the fixed guideway at Pearl Highlands. As stated in Chapter 3 of the Final EIS, system improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare collection, could complement frequent bus service at the East Kapolei, Pearl Highlands, and Ala Moana Center Stations. These bus improvements will reduce travel time and improve intermodal transfers. Bus and fixed guideway departures and arrivals will be coordinated and predictable to minimize transfer time and total trip time.

In addition, Table 3-14 in the Final EIS shows an 18-percent decrease in vehicle hours of delay islandwide with the project versus without. Figure 3-8 shows that there will be transit user-benefits islandwide because of the Project, while Figure 3-5 shows benefits for transit-dependent households. Accordingly, Central Oahu and Leeward residents will experience benefits with the fixed guideway alignment from East Kapolei to Ala Moana Center via the Airport.

The effectiveness of rail transit is more closely linked to the population density of an area served than to the total population of an area. As described in Chapter 1 of the Final EIS, the majority of the population on Oahu is located in a narrow corridor, which makes it ideal to support rail transit.

Forecasts indicate that riders who are predicted to use the train are those who will find it is more beneficial than another transportation alternative. Some fixed guideway riders are those that currently use TheBus or other modes. Forecasts indicate that approximately 40,000 vehicles will be removed from roadways as a result of the Project. Most guideway systems are attractive to automobile users because of the time benefit and the lower stress levels during the ride.

The funding of operating and maintenance costs is described in Chapter 6 of the Final EIS. The City Council's current policy is that between 27 percent and 33 percent of operating costs of the transit system (TheBus, TheHandi-Van, the fixed guideway, etc.) must be recovered from fares collected. Unless that policy is changed, the subsidy will be about 70 percent of the operating cost. In 2030, the operating cost of the fixed guideway will be about $77 million each year in 2009 dollars (compared to $222 million for TheBus and TheHandi-Van). After applying farebox revenues, the operating cost of the fixed guideway will be about $54 million each year and will be allocated from the City's annual budget as is currently done for all transit services.

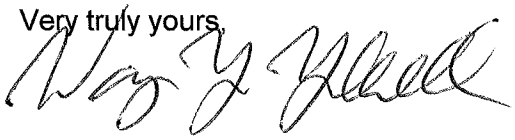
The OahuMPO is responsible for coordinating transportation planning on Oahu. The OahuMPO is comprised of City and State officials. The ORTP is a long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP guides future development of the major surface transportation facilities and programs. The ORTP contains roadway improvements planned for the island. These improvements were included in the travel forecasting conducted for the Project. A list of projects is shown in Table 2-3 of the Final EIS. The ORTP includes City and State projects.

The Project addressed in the Draft and Final EISs is the best option among those studied in the Alternatives Analysis and approved by the City Council in 2006.

Lastly, the Project is focused exclusively on construction and implementation of rail transit service, which is evaluated in the EIS. As mentioned in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in project station areas as an indirect effect of the Project. This will change the trend toward urban sprawl and is made possible largely by the fixed guideway's influence on the patterns of growth around stations and along the route. Planning and zoning around station areas will be conducted and established by the City's Department of Planning and Permitting in compliance with the City's new TOD ordinance (09-004).

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330340

Mr. William Estep
dijitul@yahoo.com

Dear Mr. Estep:

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

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

Your idea to limit the number of vehicles on Oahu could reduce traffic; however, it is outside the DTS' authority to implement. In addition, limiting the number of vehicles would not meet the Project's stated goals to improve mobility or transportation equity.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT12/08-292228R

Ms. Eddielyn Fernandez
1127 Wanaka Street
Honolulu, Hawaii 96818

Dear Ms. Fernandez:

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

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

As stated in Section 3.2.1 of the Final EIS, ridership projections for the forecast year of 2030 have been developed using the travel demand model, which was calibrated calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. 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 the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

Chapter 6 of the Final EIS discusses funding sources for the capital costs and the ongoing operating and maintenance costs of the Project. City funding for the capital cost of implementing the Project is expected to come from the 0.5 percent General Excise and Use Tax surcharge. This surcharge has been in place since January 1, 2007, and will expire December 31, 2022. City funding for transit operating and maintenance costs comes from the General and Highway Funds, which receive revenue from a variety of currently existing taxes. Whether any of these taxes will be raised in the future will be decided as part of the City's annual budget process and would most likely be decided on a variety of issues, not just transit costs. Fixed guideway operating costs will represent between 2 and 3 percent of the City's annual operating budget.

Regarding whether the Project is needed and who will use the system, no other option that has been studied has been able to function as effectively based on the criteria upon which the system was selected (i.e., mobility, support of future land use plans, equity, and reliability). More specifically, projections are that 116,000 people will use the Project each day. That is about the equivalent of half the traffic on the H-1 Freeway. If necessary, the Project can handle many more riders than that by reducing headways or adding additional trains.

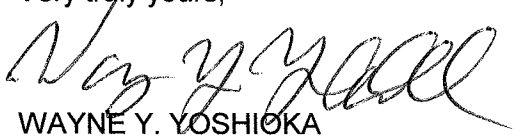
The system is built in the median of major roadways and, accordingly, it will not take away from existing travel lanes on the roads once in operation; therefore, all the added capacity is new. As shown in Table 3-14, roadway congestion (as measured by vehicle hours of delay) will decrease 18 percent with the Project compared to without.

The exact impact of construction activity on traffic is not yet known. As discussed in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. As stated in Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours.

Lastly, in response to concerns about the length of the review period, the deadline for comments on the Draft EIS was extended from January 7 to February 6, 2009.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298692R

Mr. William H. Follmer
99-1647 Aiea Heights Drive
Aiea, Hawaii 96701

Dear Mr. Follmer:

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

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

Your comments will be addressed in the same manner as submitted.

1. Both ridership and financial discussions in the Final EIS address concerns about the uncertainties associated with ridership and financial markets. Section 6.3 of the Final EIS describes the funding sources anticipated to be used to pay for the capital costs of the Project and takes into account the current economic downturn. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5309 New Starts Funds and FTA Section 5307 Funds from the Federal government and revenues from the County General Excise and Use Tax (GET) surcharge levied from 2007 through 2022. Section 6.6 of the Final EIS discusses the risks and uncertainties associated with the funding and other sources of revenue that could be used if needed.

In addition, Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operating and maintenance costs associated with maintaining the resulting transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Funding for guideway maintenance will be covered in the City's annual budgeting process and amounts to between 2 and 3 percent of the City's annual operating budget.

Ridership projections for the forecast year of 2030 have been developed using the travel demand model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan (ORTP), which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. 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. OahuMPO undergoes model updates every five years to reflect land use and transportation network changes. The model is approved by the OahuMPO Technical Advisory Committee. 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 was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. An uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

2. Funding sources for the Project, including allowance for contingencies, are documented in Chapter 6 of the Final EIS. The primary funding source for capital costs is the County's GET surcharge, which applies to Oahu only.

3. Overall, the Project is projected to increase jobs during the nine years of construction to an average of about 10,000 jobs per year (see Table 4-34 in the Final EIS). The financial plan is balanced for the entire Project so there will not be a situation in which only a portion of the system will be built. If there is a shortfall, additional

revenue sources will be considered. Section 6.6 of the Final EIS discusses risks and uncertainties, as well as potential sources to cover shortfalls. Islandwide congestion (as measured by vehicle hours of delay) will decrease 18 percent with the Project compared to the No Build Alternative (see Table 3-14 of the Final EIS). Column size and location make them impractical for use as tombstones.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-297854R

Mr. Frank Genadio
92-1370 Kikaha Street
Kapolei, Hawaii 96707

Dear Mr. Genadio:

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

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

As stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process that included the opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. Magnetic levitation systems, steel wheel on steel rail systems, rubber-tired systems including Phileas, and monorails (a subset of rubber-tired technology)were evaluated by a five-member independent panel comprised of four transit experts and a transportation academic appointed by the City Council that considered the performance, cost, and reliability of the proposed technologies. The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel operating on steel rail system. The four panel members selected steel-wheel technology because it is mature, proven, safe, reliable, economical, and non-proprietary. Proprietary technologies, meaning those technologies, including magnetic levitation, that would have required all future purchases of vehicles or equipment to be

from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail. Selecting a proprietary technology also would have precluded a competitive bidding process, likely resulting in increased overall project costs. The panel's findings were summarized in a report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report."

Magnetic levitation and monorail require a different guideway design that would have different impacts from a steel wheel on steel rail system. The guideway design and the impact analysis are being completed for the steel wheel on steel rail technology that will be used for the Project. As previously stated, other forms of fixed rail were eliminated in the scoping process and analysis of impacts to properties has been conducted for the steel wheel on steel rail technology chosen for the Project. The request for proposals will include only guideway designs that can function with the selected technology.

No comparative magnetic levitation project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. Some of the savings recognized in other countries for beam-track vehicles would not apply in the U.S. because of requirements to include an emergency egress walkway. Also, the smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. Section 6.3 of the Final EIS discusses construction cost estimates for the Project and Section 6.4 discusses operating and maintenance costs.

The High Speed Surface Transport (HSST) system operators have declined to make operating expenses available. Thus, with no comparative data available to support an operating cost estimate, there is no means to verify this statement regarding maglev's operating and maintenance costs compared to steel wheel.

23 CFR 771.111(f) states "The action evaluated in each EIS…shall not restrict consideration of alternatives for any other reasonable foreseeable transportation improvements". Future transit improvements, including an extension to the UH Manoa campus will not be precluded by the implementation of the Project.

There is no plan to implement express service, but if future operations indicate that it would be beneficial, the system could operate in skip-stop service. With the Project, trains will operate every 3 minutes in each direction during peak periods. Once on the system, it will take 42 minutes to travel from East Kapolei to Ala Moana Center. Skip-stop service could decrease travel time by a few minutes. All operating costs include a driver or conductor, though the system will be designed for automation. .

General comments on property acquisition, historic resources, and energy use are addressed in response to specific comments below. The following paragraphs address your Specific Comments on the Draft EIS:

For all comments suggesting that the Final EIS analyze technologies other than the selected Project, please refer to Chapter 2 of the Final EIS. As stated in this Chapter 2, Section 2.2.3, the technology panel's findings were summarized in its report to the City Council dated

February 22, 2008. The panel's report resulted in the City establishing steel wheel operating on steel rail as the technology to be evaluated for the Project. Therefore, the analysis of the Project in this Final EIS is based on steel wheel on steel rail technology.

7 Purpose of the Draft EIS: DTS and FTA requested information during scoping that would inform the technology selection process. No new meaningful information was received. As discussed previously, an open technology selection process was conducted during development of the Draft EIS in February 2008 and multiple panel meetings were held that were open for public comment as part of the review. The Final EIS documented the selection in Section 2.2.3.

8 Purpose of the Draft EIS: The Final EIS has been revised to address the identification of the Airport Alternative as the preferred alternative, in particular see Section 2.4.

S-4 Alternatives Considered: The City Council never enacted a technology selection bill resulting in the City accepting the findings of the panel. Meetings were conducted according to the State's open meeting or "Sunshine" law. The members of the panel represented a broad spectrum of transit and academic experience. The names of the individual members are available in the project record and not important to the findings of the Final EIS. The suggested text edit in this comment has not been deleted from the Final EIS.

S-7 Noise and Vibration: Noise impacts and mitigation are evaluated for the steel wheel on steel rail technology. Parapet walls, wheels skirts, and sound absorptive materials are included in the project costs in Section 6.3 of the Final EIS. The suggested text edit in this comment has not been incorporated into the Final EIS.

2-3 2.1.1 Screening: Fixed guideway is not an emerging rail concept. The steel-wheel on steel rail technology selected for the Project is well-established and in use in the majority of fixed-guideway systems worldwide. Emerging technologies were eliminated because they have not been proven in revenue service. The proposed language was not added because it does not provide any additional clarity regarding the guideway as a rail concept.

2-7 Table 2-2 Alternatives: As stated previously, proprietary technologies, meaning that selecting one of those technologies would require all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered proven performance, cost, and reliability benefits compared to steel wheel on steel rail. No comparative project has ever been built within the U.S. Therefore, no data are available to support a cost estimate. With no comparative data available to support an operating cost estimate, there is no means to verify this statement. The HSST system operators have declined to make operating expenses available. The text has not been revised in the Final EIS.

2-8 2.1.3 Alternatives Consideration: The single operating urban magnetic levitation system has a maximum speed of 100 kilometers per hour (62 miles per hour) which is similar to the maximum operating speeds of 50 to 60 miles per hour for steel wheel on steel rail systems. While the system is quieter, other systems may be designed to match the noise level of magnetic levitation when in operation. Steel wheel systems are capable of providing a smooth ride and reliable service. There is no safety improvement from the traction design. The assumed visual and cost savings benefits for beam-track vehicles would not apply in the U.S.

because of requirements to include an emergency egress walkway. Also, the smaller structures result in shorter span-lengths, which increases the number of columns required and the percentage of views blocked by the support structure. In addition, the greater number of columns required increases the cost to construct both the additional foundations and columns. No comparative project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. The HSST system operators have declined to make operating expenses and energy consumption estimates available. Thus, with no comparative data available to support an operating cost estimate, there is no means to verify this statement. The technology recommendation was made by an independent panel. The text has not been revised in the Final EIS.

2-9 2.2 Alternatives Evaluated in the EIS: The Final EIS has been revised to reflect the identification of the Airport Alternative as the Preferred Alternative.

2-9 2.2 Build Alternatives: The selected system will use steel wheel on steel rail technology. Therefore, the EIS will not be revised as requested.

2-9 2.2.2 Build Alternatives: The Leeward Community College Station will be at-grade independent of where the maintenance and storage facility site is constructed. The City has not been granted use of state lands in Kalaeloa and the Project would incur additional cost to extend to that vicinity.

2-19 End of second paragraph on left: The correction has been made in Chapter 2 of the Final EIS and the sentence now reads "...assumed to be in place...".

2-19 Transit Technology: The suggested wording was not changed because the steel wheel on steel rail is the technology analyzed in the Final EIS.

2-20 Figure 2-9: The suggested changes were not made because the steel wheel on steel rail is the technology analyzed in the Final EIS. No comparative project has ever been built within the U.S. Therefore, no data is available to support a cost estimate. With no comparative data available to support an operating cost estimate, there is no means to verify this statement. The HSST system operators have declined to make operating expenses available. Thus, with no comparative data available to support an operating cost estimate, there is no means to verify this statement. In addition, the shorter span lengths increase the number of columns required and thus the cost to construct both the additional foundations and columns.

2-38 Vehicle Maintenance and Storage Facility: Earthwork is included in the project cost estimate that is in the basis for Section 6.3 of the Final EIS.

3-27 Figure 3-9: This figure has been revised and now appears as Figure 3-7 in this Final EIS. This figure shows that the fixed guideway system will provide travel time benefits during the a.m. two-hour peak period. This figure represents travel times from origin to destination. Station-to-station travel time is provided in Table 3-16 in this Final EIS. Trains will operate every 3 minutes in each direction during peak periods. Once on the system, it will take 42 minutes to travel from East Kapolei to Ala Moana Center. All trains are anticipated to stop at all stations. Skip-stop service would not provide substantially improved travel times for most

users and could be a source of confusion for some riders; however, skip-stop express service could be implemented if warranted.

3-39 Table 3-21: The suggested changes for Table 3-21 were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

3-42 Table 3-23: The suggested changes for Table 3-23 were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

3-50 Construction Phasing: Section 3.5.7 was revised in the Final EIS to reflect the identification of the Airport Alternative as the Preferred Alternative.

4-5 Table 4-1: The suggested changes for acquisitions, displacements, and relocations (Table 4-1) were not made because the steel wheel on steel rail is the technology analyzed in this Final EIS.

4-5 Table 4-1: The impacts to community services and facilities were only analyzed for the technology of steel on steel rail. The suggested changes were not made to Table 4-1.

4-8 Table 4-1: The noise and vibration analysis conducted for this Project only applies to steel on steel rail and were not conducted, nor will be conducted for other eliminated technologies. The suggested changes were not made to Table 4-1.

4-9 Table 4-1: Steel on steel technology is the chosen technology for this project. Impacts to street trees were only analyzed regarding the impacts from this technology. The suggested changes were not made to Table 4-1.

4-33 Cemeteries: The sentence under the Cemeteries heading in Section 4.5.2 has been revised in this Final EIS to correctly state, "One cemetery near Aloha Stadium and one near Waimano Home Road are adjacent to the project alignment."

4-36 Airport Alternative: The correction for Hickam Air Force Base has been made in Section 4.5.3 of this Final EIS.

4-39 4.5.2: The term "White" is used in the Final EIS, which is consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-42 Table 4-8: The terms used in this Final EIS are consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-45 Ala Moana-Kakaako: The sentence under Ala Moana-Kakaako heading in Section 4.6.3 of this Final EIS has been revised to state, "Kakaako has been designated a redevelopment area, which may result in a change in character along the Project alignment. However, substantial development has recently occurred in the neighborhood; several high-rise condominium developments have been built, and additional residential and commercial developments are planned. The elevated transit structure will not create a barrier to pedestrian or other modes of travel."

4-47 Regulatory Context: In Section 4.7.1 of this Final EIS, under the heading Regulatory Context, the sentence has been revised to state, "Additional laws, statutes, guidelines, and regulations that relate to EJ issues include the following..."

4-47 Defining Environmental Justice Areas: The term "Black" is used, which is consistent with usage by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

4-51 Table 4-9: The terms used in Chapter 4 of this Final EIS are consistent with those defined by the U.S. Department of Transportation's Order 5610.2 and the U.S. Census Bureau.

As stated in Section 4.8 of this Final EIS, the simulations are intended to represent the scale and spatial relationships of project elements to other objects. These simulations serve several purposes: they were used to evaluate visual and aesthetic consequences, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis. The simulations generally depict that the guideway (technology) will have a visual effect on the visual environment. The stations that were simulated for the visual assessment generally depict those that are expected to have a comparatively greater visual effect (see Figure 4-31 for the Chinatown Station and Figure 4-34 for the Downtown Station). Figure 2-12 in Section 2.5.2 of this Final EIS is a cross-section view that is intended to more accurately show the guideway dimensions. DTS has considered your request for additional station simulations. However, it was determined that the existing simulations presented in the Final EIS adequately represent the Project. Monorail and mag-lev renderings were not included because the steel wheel on steel rail technology was identified as the preferred alternative.

4-91 Salt Lake Alternative: The text related to views along Moanalua Stream does not require a change in the Final EIS since the Salt Lake Boulevard Alternative is not discussed in the Final EIS.

4-95 4.8.2: In regards to Section 4.9.2 in the Final EIS, "Transportation Improvement Plan" is appropriate because it is in reference to the plan and the text will not be revised to "Program" in the Final EIS.

4-97 Figure 4-37: Noise impacts and mitigation were evaluated for the technology of steel wheel on steel rail. Because this is the transit technology analyzed in the document, it is appropriate to use the term "Rail" in Figure 4-51 in the Final EIS.

4-100 and 4-101 Tables 4-15 and 4-16: The other three rail technologies are not being studied in the Draft or Final EIS. Related tables and figures have not been revised.

4-108 Electric and Magnetic Fields: Because magnetic levitation technology is not being considered for implementation, the suggested changes have not been incorporated into the document.

4-137 Table 4-29: Magnetic levitation and monorail require a different guideway design that would have different impacts from a steel wheel on steel rail system. The guideway design

and the impact analysis are being completed only for the steel wheel on steel rail technology that will be used for the Project.

4-149 and 4-150 Table 4-32: Property names in this table refer to the names of historic properties listed in or determined eligible for listing in the National Register of Historic Places as identified in the Honolulu High-Capacity Transit Corridor Project Historic Resources Technical Report (RTD 2008o). Names used to identify historic properties in the National Register or in Section 106 documentation may not correlate with current names. Names may reflect previous uses and/or owners, or may relate to the property's historic significance, such as the CINCPAC Headquarters building. Accordingly, neither edit has been made to this Final EIS.

4-166 4.18.2: The Final EIS has been updated to include the recent changes in the TOD ordinance. The TOD ordinance is discussed in Section 4.19.2 of this Final EIS.

4-166 4.18.2: Hunt Development Group was deleted from Section 4.19.2 of this Final EIS.

4-171 Table 4-36: Upon verification, Table 4-39 in the Final EIS has been updated and the reference DeBartolo has been deleted.

5-3 5.2: Section 2.1.3 of the Draft EIS explains that steel wheel on steel rail was the technology chosen for analysis. No other forms of rail are being analyzed in the Draft or Final EISs.

5-3 5.3: "Affects" has been changed to "effects" in the Final EIS, Section 5.4. The sentence now states, "....presents effects to these 81 historic resources, as established by current consultation."

5-8 and 5-9 Table 5-2: As discussed above, property names in this table refer to the names of historic properties listed in or determined eligible for listing in the National Register of Historic Places. "CINPACFLT" refers to the historic landmark. While the Commander may no longer be called, "Commander in Chief", the National Historic Landmark is listed as "CINCPAC".

5-24 Measures to Minimize Harm: The smaller structures proposed in the comment result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. The proposed 120 to 150 foot span lengths would require a larger structure, similar to the steel wheel on steel rail system.

6-3 Table 6-1: Other technologies are not being studied in the Draft or Final EISs. Chapter 6 has not been revised to reflect other technologies.

6-4 General Excise and Use Surcharge: The amount of County General Excise and Use Tax (GET) Surcharge revenues withheld by the State has not been included in the revenue estimates. The surcharge collections are not being re-directed by the State. The Final EIS presents only information on funding that will go towards the Project.

6-7 Fare Revenues: To date, the HSST system operators have declined to make operating expenses available and no comparative maglev project has ever been built within the

U.S. Therefore, no data are available to support a cost estimate. The claims in the comment have not been substantiated by any revenue service operation. The Final EIS (Table 6-3) presents annual operating and maintenance costs for the fixed guideway as $77 million in 2009 dollars and $126 million in 2030 dollars. After adjusting the current-year value from 2007 to 2009, these values are consistent with the values provided in the Draft EIS. In 2008, the Salt Lake Alternative was anticipated for initial construction. The annual operating and maintenance cost of $63 million in 2007 dollars for that alternative was consistent with the assessment of about $60 million in today's dollars.

6-11 System Operation: All operating costs include a driver, though the system will be designed to allow for automation. The decision to use an operator or not will be made at a later date.

7-11 Important Trade-offs: The chapter has been revised to reflect selection of the Airport Alternative as the Preferred Alternative.

541 Appendix C: The suggested changes were not made to Draft EIS Appendix C, Construction Approach (now appearing as Appendix E in the Final EIS) because steel wheel on steel rail is the selected technology that is being analyzed in the Draft and Final EISs.

596 Comment Sheet: The comment from the Hawaii State Department of Transportation (HDOT) was in reference to phrasing in an early administrative draft of the EIS, which was changed in the Draft EIS. HDOT did not comment on the selection of a technology. As discussed in Section 2.2.3 of the Final EIS, a five-member panel comprised of four transit experts and a transportation academic appointed by the City Council considered the performance, cost, and reliability of the proposed technologies. By a four-to-one vote, the panel selected steel wheel operating on steel rail as the technology for the Project because it is well-established, safe, reliable, economical, and non-proprietary. Technologies other than steel wheel on steel rail were eliminated for because they are proprietary technologies, meaning that selection of one of those technologies would require all future purchases of vehicles or equipment to be from a single manufacturer. These were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel on steel rail.

1045 D.R. Horton Schuler: Mr. Jones does not represent the City. The view expressed in his testimony is not a policy of the Project.

1160 Frank Genadio: The energy mix for electricity generation of the system will depend on HECO's power production. As stated in Chapter 4, Section 4.11.3 the Project will consume approximately 1 to 2 percent of the total projected electricity generated on Oahu in 2030. The planned electricity generation capacity on Oahu will be sufficient to support the transit system, but the electricity distribution system will require various updates to support the system. Integration of photo-voltaic cells into project features could reduce net project electricity demand.

1494 Fixed Guideway Alternatives: DTS and FTA requested information during scoping that would inform the technology selection process. The information submitted was reviewed and incorporated into the selection process. A technical review process that included the

opportunity for public comment was used in parallel with the alignment analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry.

1502 Project Alternatives Analysis Report: While no information was received during the scoping process that would eliminate one or more of the technology alternatives, the lack of scoping comment did not preclude the selection of a technology. The technology selection process is discussed above.

1571 Transit Advisory Task Force: The smaller structures proposed result in shorter span-lengths, which increases the number of columns required and the cost to construct both the additional foundations and columns. To match the Project's 120 to 150 foot span lengths and other requirements, such as an emergency walkway, the structure would be of similar size to the Project's.

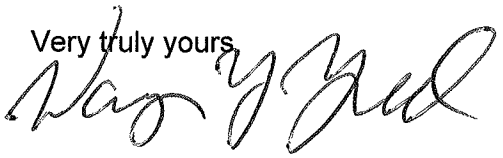
1571 Transit Advisory Task Force: The Transit Advisory Task Force was an independent body established by the City Council. The task force comments do not represent the Project. Comments regarding the views expressed by the task force are noted.

1715 Transit Scoping Meeting Comments: Surface park-and-ride lots could include covers that could be used for photovoltaic cells. This will be considered during final design of the Project.

Appendix E City Correspondence: Scoping for the Draft EIS in March of 2007 requested comments on technologies. At the conclusion of the scoping period in 2007, the cost and schedule ramifications of delaying technology selection until after issuance of the Draft EIS were not fully understood. Once the impact of delaying the selection was understood, an open and independent process was established for selection of technology during the Draft EIS process. The selection was conducted as an open process with multiple meetings of the independent panel that were open to the public during February 2008. The selection of technology process was documented in the Draft EIS.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334420

Mr. James Ha
1201 Liliha Street, #202
Honolulu, Hawaii 96817

Dear Mr. Ha:

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

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

Your comment has been noted. As illustrated in Chapter 2 of the Final EIS, the Iwilei Station is located at Kaaahi Street and Dillingham Boulevard, one block from Liliha Street.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334331

Mr. Gerhard C. Hamm
1930 Alaweo Street
Honolulu, Hawaii 96821-1304

Dear Mr. Hamm:

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

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

The conditions between Phoenix and Honolulu are different. The systems are both 20 miles long, but the Phoenix line is estimated to carry less than half the riders of the Honolulu system and take more than twice as long to travel the 20 miles. Moreover, the Phoenix line removes two lanes of traffic along most of the route. There are numerous alternative routes available for motorists in the Phoenix metro area. The Honolulu Project will not remove any travel lanes. It will add to the capacity of the overall transportation system without reducing the existing, limited roadway supply. Phoenix did not need to preserve highway capacity; Honolulu must. To accomplish that, the system must be elevated (underground is more expensive). The cost of an elevated system is higher than an at-grade line such as the recently opened system in Phoenix, but the Honolulu service will have a much higher capacity and will be more reliable.

Lastly, the proposed capital funding sources for the Project cannot be used for non-public transportation projects such as a secondary wastewater treatment plant. Enabling

legislation for the County General Excise and Use Tax surcharge and Ordinance 07-001 preclude the use of the collected funds for purposes other than a fixed-guideway transit system.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335668

Ms. Shirley Hasenyager
235 Kuuhoa Place
Kailua, Hawaii 96734-2734

Dear Ms. Hasenyager:

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

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

Your letter will be answered in the same manner as it was submitted.

1. *Section 4.4.3 of the Final EIS presents the mitigation associated with acquisitions, displacements, and relocations for full and partial property acquisitions. Section 4.18.1 of the Final EIS lists the proposed mitigation measures to reduce adverse economic hardships for existing businesses (including small businesses) along the project alignment during construction. The City has a right-of-way team that has contacted each potentially affected parcel owner to discuss potential project impacts on their respective property. All property acquisitions and relocations are subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act, and the City will follow those procedures. Where relocations will occur, compensation will be provided to affected property owners,*

businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

2. *Chapter 2 of the Final EIS shows the location and extent of all project stations in Figures 2-17 through 2-37. In addition, visual effects of the system are addressed in Section 4.8 of the Final EIS. As discussed in Section 8.4 of the Final EIS, 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 for 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.*

   Stations will be patrolled and will be closed between midnight and 4:00 a.m. Materials and textures will be graffiti-resistant. Physical deterrents, such as plantings, will be used where appropriate. Graffiti removal is an anticipated maintenance activity.

3. *Since trains and rail stations will be electrically powered, the system's infrastructure is being designed to handle service disruptions. For example, trains will draw power from many points along the route, so an outage in a few areas should not disrupt service to the remainder of the system. If electrical power is lost system-wide, then train brakes are designed to stop the rail cars even without power. Lights will stay on in trains and stations; backup batteries will provide lighting for several hours. The train operations center will communicate with passengers via the public address system and intercom to provide guidance. If power is restored within a short time, service will resume. With a prolonged outage, the operations center will direct passengers to exit the trains and walk along a lighted emergency walkway on the guideway to the nearest station. For those unable to exit rail cars, help will be provided by emergency responders and transit staff. Passengers will be met at the train station by a coordinated response from emergency responders and City transportation workers.*

4. *The luggage policy for the system is not final, but the concept of the policy will be to allow luggage that does not interfere with the safety or comfort of other passengers.*

   The exact impact of construction activity on traffic is not yet known. As discussed in Section 3.5.7 of the Final EIS, a Maintenance of Traffic (MOT) Plan will be developed in advance by the contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will identify measures to mitigate temporary construction-related effects on transportation and will address roadway closures for streets identified in Table 3-27 of the Final EIS. As stated in

Section 4.18.1 of the Final EIS, several public involvement strategies will be used to inform businesses and the public about construction activities, including roadway detours.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the 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. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

Section 4.8.3 of the Final EIS discusses the general consequence of the changes to visual conditions due to the presence of the elevated guideway and states that, "residents living in high-rise buildings adjacent to the project alignment will experience visual changes as a result of the Project."

The Economic Activity section of the Draft EIS (Section 4.2) did not evaluate the impact of the Project on property values because those values are subject to economic forces outside the direct control of the Project. However, as experienced in other cities, the value of properties with access to transit stations is substantially higher than for properties that are distant from the system. In addition, other development, including retail, businesses, schools, etc., could occur near transit stations.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299027R

Mr. Kirk S. Tomita
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Dear Mr. Tomita:

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

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

(1) Engineering/Project Management: As presented in Section 4.18.2, Communities and Neighborhoods, 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 and will include, but not be 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. The vertical and lateral clearances of overhead and underground utility lines shall comply with the rules and regulations of the appropriate utility agency and Hawaii Administrative Rules during final design and approved by

the utility agencies. This coordination will include notifying and working with HECO regarding non-State roadways and roadway rights -of-way. Design refinements with all affected HECO facilities will be developed in close coordination with HECO and the design team as final design progresses. Access will be maintained to all HECO facilities, though it may be modified in some locations.

(2) Engineering/Substation, Protection & Telecommunications: Preliminary Engineering (PE) drawings for the Iwilei segment will be submitted to HECO for review and coordination by January 2010. Design coordination will continue through the final design of the Project.

(3) Power Supply/Power Plant Engineering:

(a) Honolulu Power Plant: Locating the Downtown Station at a different site would avoid use of the Honolulu Power Plant Property, and accordingly, alternative sites have been investigated, as was described in the HECO Downtown Plant and Leslie A. Hicks Building Avoidance Alternatives subsection in Section 5.5.2 Historic Sites of the Final EIS. Avoidance alternatives are limited by Honolulu Harbor and by the geometry of Nimitz Highway. Several alternative alignments were considered during the Alternatives Analysis phase, one of which included Queen Street. While this alternative would avoid the HECO property, it would have impacts on historic resources within the Hawaii Capital Historic District. Other small shifts of the station entrance were considered and are not feasible because they would require the demolition of one of the high-rise office buildings or impact Irwin Park. In addition to considering small shifts of the station entrance, two other practical avoidance alternatives were evaluated to relocate the Downtown Station to avoid this property. None of these were feasible design options. Therefore, the Project will use approximately .2 acres of the HECO property in the Ewa corner of the property near Bishop Street. PE drawings for the Downtown Station will be submitted to HECO for review and coordination by January 2010 and design coordination will continue through the final design of the Project.

(b) Waiau Power Plant: Column design along Kamehameha Highway has been revised and the left turn onto Kamehameha Highway from the Waiau Power Plant will be preserved.

(4) Engineering/Project Management: Coordination with HECO will be ongoing throughout the design and construction process. PE design drawings have been submitted to HECO for the First Construction Phase, East Kapolei to Pearl Highlands. The drawings included information showing the location of existing HECO facilities and identified relocation requirements. PE drawings for the Second, Third, and Final Construction Phases will be submitted to HECO in the schedule shown in Figure 2-43 of the Final EIS. DTS has also provided HECO with proposed electrical utility relocation plans and comments and suggestions provided by HECO have been incorporated. Design coordination will continue through the final design of the Project.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT1/09-294742R

Dr. Aaron Hebshi
Bicycling Committee
University of Hawaii Manoa
1045A Kalikimaka Street
Honolulu, Hawaii 96817

Dear Dr. Hebshi:

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

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

General Comments

Your comments regarding an extension to the University of Hawaii at Manoa and also comments regarding bicycles have been noted. As detailed in Section 1.1.2 of the Draft EIS, and as approved by the City Council with Resolution 07-039, the Project extends from East Kapolei to Ala Moana Center. 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 proposed 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 this Final EIS. The future extensions are not part of this Project, thus they are not required to be evaluated under Chapter 343 of the Hawai'i Revised Statues and the National Environmental Policy Act (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 this 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. UH Manoa will be connected by enhanced bus service until the future extension is built. The Project would coordinate with the University of Hawaii regarding future extensions.

Specific Comments

Page 2-20: Bicycles will also be allowed on trains, as regulated by a bicycle policy. This policy will be determined at a later time prior to the opening of the fixed guideway system.

Page 2-24: Bicycle racks will be available at each transit rail station. There will also be security at stations and in the areas around stations.

Page 3-23: Your comment is noted. The mode shares shown in Table 3-13 are islandwide. Mode share changes will be different in the corridor and during peak travel periods. As shown in Figure 3-11 in the Final EIS, transit mode share will be much higher during the a.m. two-hour peak period with the Project compared to No Build conditions.

Page 3-34: No studies related to your question have been undertaken. However, the usual thresholds for walking to rail transit stations like the ones proposed for Honolulu is ½ mile in distance or 10 minutes in time. For bicycles, the distance thresholds would be longer.

Page 3-43: The Airport Alternative has been selected for the Project instead of the Salt Lake Alternative. As a result, the bicycle lanes along Salt Lake Boulevard will not be affected by the Project.

Regarding your other question on Page 3-43, the guideway generally runs along a median in the center of roadways such as Dillingham Boulevard, Kamehameha Highway or Farrington Highway. Where a median does not already exist, the Project will create a median just wide enough to accommodate the guideway columns by relocating travel lanes slightly. There is generally insufficient room beneath the guideway for a continuous bikeway at street level. Also, the guideway structure itself is designed to minimize visual impact and overall cost by being as short and compact as possible. As a result, there are no plans to provide a bike path within the structure of the guideway.

Page 3-48 and 3-50: Your appreciation of our mitigation efforts has been noted.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331794

Mr. Bob Kilthau
1310 Haloa Drive
Honolulu, Hawaii 96818

Dear Mr. Kilthau:

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

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

Your preference for the Airport Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

In addition, a Maintenance of Traffic (MOT) Plan will be developed by the construction contractor with approval from the City and the Hawaii Department of Transportation. The MOT Plan will mitigate construction-related effects on the transportation system. Table 3-27 in the Final EIS identifies roadways that will experience peak-period lane closures during construction.

For schools and other noise-sensitive locations that do not have nighttime sleep activities, the FTA Transit Noise and Vibration Impact Assessment compares the existing maximum-hour noise level to the maximum-hour noise that the transit line will produce by itself. Construction noise will be a temporary impact, and all local noise ordinances will be followed to reduce noise annoyance to residents and schools.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334457

Mr. Matt Lamon
matt.lamon@gmail.com

Dear Mr. Lamon:

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

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

The construction estimates provided in the Final EIS are related to the length of time required to complete construction of the system. Any other activities not related to construction could cause delays that would pose greater impacts to communities.

Relocations will occur early in the process. Condemnation is a last resort.

Where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The mitigation measures related to relocations include the following:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or businesses' financial means.*

- *A minimum 90-day written notice will be provided before any business or resident will be required to move.*

- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; and persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

Section 3.5 of the Final EIS describes construction-phase effects on transportation during the approximately nine-year construction period. An "alternative timeline" for construction is not part of the Final EIS. The Project's deliverable timeframes and construction schedule are part of the contractor's proposal and become part of the binding construction contract documents. The selection of the construction contractor for the Project will be based on both qualifications and price with the evaluation of qualifications to include the examination of the contractor's prior history of meeting construction schedules for similar projects as well as an examination of recent claims history with regard to project schedules.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333705

Ms. Kathleen Meier
629 Palawiki Street
Kailua, Hawaii 96734

Dear Ms. Meier:

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

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

1. *The system specification is compatible with either a light- or rapid-rail vehicle.*

2. *While the capital cost estimates for the Project, which are used in the financial analysis, are higher than those of other recent rail lines this reflects higher construction costs in Hawaii and higher shipping costs of materials to Hawaii.*

3. *The financial analysis described in the Final EIS is subject to a number of risks and uncertainties, as described in Section 6.6 of the Final EIS. The Final EIS reflects the latest economic trends in both cost and revenue forecasts.*

4. *Enabling legislation for the County General Excise and Use Tax surcharge and Ordinance 07-001 preclude the use of the collected funds for purposes other than a fixed guideway transit system.*
5. *A travel demand forecasting model was used to forecast roadway conditions in 2030, both with and without the Project. As described in Chapter 3, Section 3.4 of the Final EIS, modeling took into account committed transportation projects*

anticipated to be operational by 2030. Committed transportation projects are those identified in the Oahu Regional Transportation Plan (as shown in Table 2-4 of the Final EIS). These projects include a p.m. reversible 'zipper' lane and widening H-1 at Middle Street. As shown in Tables 3-9 and 3-10 of the Final EIS, roadway conditions will get worse, despite these improvements. However, these tables also show that traffic conditions will improve up to 11 percent with the fixed guideway system. In addition, a Managed Lane Alternative was evaluated during the Alternatives Analysis phase of the Honolulu High-Capacity Transit Corridor Project. While the Managed Lane Alternative would reduce freeway congestion (measured as vehicle hours of delay), it would increase overall system congestion by inducing additional travelers to drive, which would result in increased congestion on arterial and collector facilities accessing the freeways. System-wide congestion will be greater in 2030 than today. Spot congestion in some locations could decrease with the managed lane alternative; however, the reversible managed lane alternative would result in an increase in system-wide congestion compared to the No Build Alternative, while the Project will result in a decrease in congestion compared to the No Build Alternative.

6. *Modern rail technology continues to evolve. The modern transit vehicle is less similar to an eighteenth-century locomotive than a modern automobile is to the Model T.*

7. *Guided bus systems constructed on an elevated guideway, as would be required for use in Honolulu, would require a larger and more expensive structure than required for rail transit.*

8. *As discussed in Chapter 3, Section 3.2.1 of the Final EIS, the ridership forecasts are based on a travel demand forecasting model used by the Oahu Metropolitan Planning Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on "best practices" for urban travel models in the U.S. This modeling approach has proven effective in estimating ridership in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years. This model is based on guidelines established by the FTA. Projections for 2030 have been developed using the travel demand model, which was calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. 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 the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and*

recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate at home) based on travel surveys in Honolulu.

The Project is among the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing probabilistic upper and lower limits of ridership projections. FTA has worked closely with the City during this work effort. A variety of factors were considered in the uncertainty analysis, including the following:

- *Variations in assumptions regarding the magnitude and distribution patterns of future growth in the Ewa end of the corridor*
- *The impact of various levels of investment in highway infrastructure*
- *The expected frequency of service provided by the rapid transit system*
- *Park-and-ride behavior with the new system in place*
- *The implications on ridership of vehicle and passenger amenities provided by the new guideway vehicles*

Given all the factors considered, the anticipated limits for guideway ridership in 2030 is expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations.

As identified in Chapter 3, Table 3-14 of the Final EIS, the Project will result in reduced vehicle hours of delay of 18 percent compared to the No Build alternative. The reduction in delay will be attributable to shifts in travel demand from automobile to transit.

9. *While information technology has enabled people to remain connected from any location, it has not eliminated the need or desire of people to travel on the island.*

10. *The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Waiʻanae end of the corridor to dense high-rise development at the Koko Head end.*

    As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *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.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

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

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-335530

J. Mitchell
(No address or e-mail provided)

Dear J. Mitchell:

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

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

Your comments regarding the Project are noted. Section 6.3 of the Final EIS describes the financial resources anticipated to pay for the capital costs of the Project. Capital costs, 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 County General Excise and Use Tax surcharge levied from 2007 through 2022 on Oahu.

To answer your question about the maintenance of the system, steel-wheel systems have lower long-term maintenance costs than other high-capacity, fixed guideway technologies. The steel that will be used for the Project will be compatible for use in a marine environment. Steel rail is capable of long-term operation in such an environment. For example, excursion service is still provided in Ewa using rails that are over 100 years old.

The Alternatives Screening Memorandum (DTS 2006a) recognized the visually sensitive areas in Kakaako and Downtown Honolulu, including the Chinatown, Hawaii Capital, and

Thomas Square/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15 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 (Figure 2-4).

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 could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit 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 (see bullets below). 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 (or less) blocks 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 operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project 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 reach 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), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects 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**— The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent*

effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets. Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. 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 with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a 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.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential 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 (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is 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 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 impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade 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, prolonged exposure to construction noise, and traffic impacts.*

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 further analysis.

The City passed a transit-oriented development (TOD) Ordinance 09-4 in March 2009 in anticipation of the Project. Development in the study corridor, whether highway-oriented or TOD, will be based on market demands. Pursuant to the policy, TOD may occur in project station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near stations, attracting new real estate investment nearby. Therefore, an indirect effect of the Project will be to alter development near stations by attracting higher densities than presently planned or could otherwise be developed near transit stations. If development occurs around stations, it is anticipated that City infrastructure would be improved in these areas. There is no noise impact associated with transit station locations.

As discussed in Chapter 2 of the Final EIS, the design of stations and public areas will apply Crime Prevention through Environmental Design (CPTED) principles to minimize the incidence of crime. These measures have proven effective with other systems.

As discussed previously, the financial resources anticipated to pay for the capital costs of the Project are described in Section 6.3 of the Final EIS. As shown in Table 6-1, the Project will cost about $4.6 billion in 2009 dollars and $5.5 billion in inflated dollars. Please refer to Chapter 6 of the Final EIS. As shown in Chapter 3 of the Final EIS, roadway congestion, as measured by vehicle hours of delay, will decrease 18 percent with the Project.

A Bus Rapid Transit Alternative is a variation on the Transportation System Management (TSM) Alternative that was evaluated in the Alternatives Analysis. As summarized in the Draft EIS, while the alternative has merit for cost-effectiveness, its overall system benefit would be low compared to fixed guideway transit. Light rail technology was not eliminated; however, at-grade light rail would not meet project speed and reliability requirements. Additional clarification has been included in the Final EIS.

The connection to Honolulu International Airport will benefit visitors, but the primary reason for the connection is the large concentration of employees in the area. Of the 116,000 daily fixed guideway trips, 9,900 trips are by visitors, of which 1,800 are to or from the Airport. The Airport Alternative serves major employment destinations at and near the Airport and at Pearl Harbor. As shown in Table 3-13 of the Final EIS, about 50 percent of daily transit trips either originate or end at work. In addition, there are only 10 stops between the Airport and Ala Moana Center.

Most construction workers will be local, although some specialized expertise will be brought in. The bulk of the money will be paid to people on the island. Regarding housing, as seen in other cities, the value of properties with access to transit stations is higher than for

properties that are distant from the system. In addition, other development, including retail, businesses, schools, etc., could occur near transit stations.

As stated in Section 4.10.3 of the Final EIS, the Project will cause no severe noise impacts. Moderate impacts will occur at upper floors of a few high-rise buildings (as shown in Table 4-18 in the Final EIS). With the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places.

The project design includes an integrated noise-blocking parapet wall at the edge of the guideway structure that extends 3 feet above the top of the 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. The use of sound-absorptive materials below the tracks in the areas that will experience moderate noise impacts will reduce the Project noise levels from the upper floors to below the impact level. Once the Project is operating, noise levels will be re-measured to confirm that there are no noise impacts from the Project.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330578

Mr. Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

Dear Mr. Mori:

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

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

As discussed in Section 2.5 of the Final EIS, the system is designed so vehicles could either be manually operated by a driver or fully automated (driverless). Your comment regarding having fully automated trains is noted.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT8/09-330339

Mr. Dale Moyen
moyen@hawaii.rr.com

Dear Mr. Moyen:

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

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

Your comments regarding HOT lanes and the EZ Way proposal are noted.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333535

Samoa Naea
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Samoa Naea:

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

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

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been

completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298450R

Mr. Gary O'Donnell
320 Liliuokalani Avenue, Unit 2005
Honolulu, Hawaii 96815

Dear Mr. O'Donnell:

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

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

1. Your support for the Project has been noted. The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

2. As stated in #1, the Airport Alignment will result in the fewest vehicle miles traveled and vehicle hours of delay, more information can be found in Chapter 3 of the Final EIS. An elevated Managed Lane Alternative was previously evaluated and eliminated for the reasons detailed in Section 2.1 of the Draft EIS.

3. The Project is intended to facilitate movement along the main "spine" of commuter activity in Honolulu. To address your other comments:

a. Rail vehicles will be designed to accommodate luggage that does not interfere with the safety or comfort of other passengers, to be regulated according to a luggage policy to be developed. No change to policy on TheBus is proposed at this time. Rail vehicles will also be designed to accommodate bicycles, which will be permitted on trains according to a bicycle policy to be developed.

b. The structure is required to have a side safety barrier. Using a solid parapet wall adds substantial noise reduction as well. The vehicle specifications include a wheel skirt that covers the wheel. It is made effective in combination with the parapet wall.

c. Such a configuration would reduce vehicle strength and add to vehicle weight, making the entire system less efficient.

d. Center platform stations generally have a greater total shaded area because of the need to widen and split the track structure prior to the station. Center platform stations are proposed where appropriate. DTS does not intend to compete with private enterprise by placing retail within stations.

e. A people-mover system is not part of the Project, but the Project does not preclude its construction. As shown in Figure 2-27 of the Draft EIS, the Airport Station will not be significantly farther away from the terminal than the parking garages. The Station will be connected to the parking garages and terminal by a pedestrian path.

f. The location of the Airport Station will not be changed. As noted in Section 2.2.2 of the Draft EIS, "bus service would be enhanced and the bus network would be modified to coordinate with the fixed guideway system." Existing and future bus routes, including route numbers and frequencies, are presented in Appendix D of the Final EIS.

4. As described in Section 2.5.10 in Chapter 2 and further in 8.6.9 in Chapter 8 of the Final EIS, to support phased opening, the first construction phase must be connected to a maintenance and storage facility, which requires considerable property. No location has been identified closer to Downtown with sufficient available property to construct a maintenance and storage facility; therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

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

The portion of the corridor Ewa of Pearl Highlands is less developed than the areas Koko Head. Therefore, the right-of-way can be obtained more quickly, which will allow the overall project construction to begin sooner, resulting in lower total construction costs. Construction is planned to continue uninterrupted Koko Head from Pearl Highlands to Aloha Stadium, then Kalihi, and finally to Ala Moana Center.

a. The suggested location of Keehi Lagoon Park is a publically owned recreational facility that may not be converted to transportation use. The other listed sites are not available or do not provide sufficient space for a facility. The Project will restore any areas directly affected by construction.

5. To address those comments:

a. As shown in Table 3-27 in the Final EIS, lane closures are expected on Nimitz Highway during construction. As stated in Section 3.5.7 of the Draft EIS, a Maintenance of Traffic (MOT) Plan will be developed by the contractor that must be approved by the City and the Hawaii Department of Transportation. The MOT Plan will help mitigate construction-related traffic effects.

b. As stated in Section 4.18.2 of the EIS, the Downtown Station area already has transit-oriented development (TOD) or TOD-like developments. Further redevelopment could occur, particularly around the Port, and incorporate more TOD elements in the future. Development in the historic districts is somewhat limited. The Project is unlikely to substantially alter future development plans in the Downtown area.

c. The platform will be more than 30 feet above street level. It will allow transit patrons to be above surge level.

d. The proposed alignment would result in several additional displacements, would be less centralized, and would not be able to serve Downtown and Kakaako as well as the Project. The Project includes a station at Kaaahi Street.

e. The proposed alignment would not meet the design criteria of a minimum 500-foot curve radius without the removal of several buildings.

f. A King Street alignment was evaluated in the Alternatives Analysis and shown to serve substantially fewer riders than the Dillingham to Kakaako alignment included in the Project.

g. As shown in Figure 2-8 of the Draft EIS, the Project follows Halekauwila Street.

6. Thank you for your suggestions. However, any such fair would be outside the authority of the DTS. In addition, it is not in the purview of the EIS to determine future uses of Aloha Stadium, which is under the jurisdiction of the State.

7 & 8. It is not in the purview of the EIS to initiate reform of the built environment into a "Garden City." The City plans, not the EIS, direct future development that will occur within the study corridor. In addition, thank you for submitting your ideas of integrating the Project with other opportunities. It is not within the purview of the EIS to address these opportunities.

9. Thank you for your comment.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333490

Ms. Florita Pa
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Pa:

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

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

Your planned use of a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

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SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334337

Mr. Lance Pazaglia
445 Seaside Avenue, #4301
Honolulu, Hawaii 96815

Dear Mr. Pazaglia:

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

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

Your preference for a Fixed Guideway Transit Alternative has been noted. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the

Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336313

Mr. John Ridings
wcoastjohn@aol.com

Dear Mr. Ridings:

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

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

In parallel with the alignment analysis, as stated in Section 2.2.3 of this Final EIS, the NEPA Notice of Intent requested input on five transit technologies. A technical review process included the opportunity for public comment and was used in parallel with the alternatives analysis to select a transit technology. The process included a broad request for information that was publicized to the transit industry. Transit vehicle manufacturers submitted 12 responses covering all of the technologies listed in the Notice of Intent. An independent five-member technology panel composed of four transit experts and a transportation academic appointed by the City Council evaluated guided rubber-tire-on-concrete systems (e.g., Phileas bus system and VAL-type systems), monorail (which is a variation on rubber-tyred technology), steel-wheel-on-steel-rail systems, (e.g., light rail and rapid rail), and magnetic levitation (MAGLEV) . The panel considered the performance, cost, and reliability of the proposed technologies.

Proprietary technologies, meaning those technologies that would have required all future purchases of vehicles or equipment to be from a single manufacturer, were eliminated because none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.

The panel accepted public comment twice as part of its review. By a four-to-one vote, the panel chose a steel wheel vehicle operating on steel rail system because it was considered safe, reliable, economical, and non-proprietary. Those results are documented in the panel's report to the City Council dated February 22, 2008 entitled "Independent Technology Selection Panel Report".

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334332

Mr. Kenny Smith
3178 T Street
Sacramento, California 95816

Dear Mr. Smith:

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

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

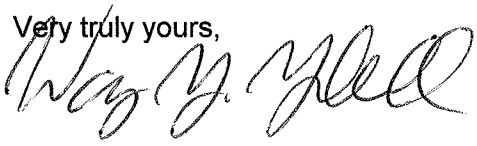
In answer to your comments, the Airport Alternative from East Kapolei to Ala Moana Center has been selected as the Preferred Alternative. While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is

discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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 proposed 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. 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 this 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. A copy of the Final EIS has been included with this letter. In addition, copies are available on the project website at www.honolulutransit.org.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333916

Ms. Pam Smith
P.O. Box 2242
Ewa Beach, Hawaii 96706

Dear Ms. Smith:

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

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

Section 6.3 of the Final EIS describes the financial resources anticipated to be needed to pay for the capital cost of the Project and the City's overall public transportation system. Capital costs of the Project, including finance charges, are expected to be fully paid for by a combination of FTA Section 5307 and FTA Section 5309 New Starts Funds from the Federal government and revenues from the County General Excise and Use Tax Surcharge levied from 2007 through 2022 on Oahu. The analysis takes the current economic downturn into account. Section 6.4 of the Final EIS describes the funding sources to pay for ongoing operations and maintenance costs associated with maintaining the transit system in a state of good repair. Operating and maintenance costs will be paid for from the same sources currently used for TheBus: Federal funding, fare revenues, and subsidies from the City's General and Highway Funds. Section 4.19 of the Final EIS discusses the potential indirect economic effects of new development and redevelopment near the Project alignment and around stations.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-331521

Mr. Ted Taheny
85-1053 Piliuka Way
Waianae, Hawaii 96792

Dear Mr. Taheny:

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

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

As stated in Chapter 3 of the Final EIS, each station will have facilities for parking bicycles. Bicycles will also be allowed on trains, as regulated by a bicycle policy. This policy will be determined at a later time prior to the opening of the fixed guideway system.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-334561

Mr. Steve Timpson
stimpson@hawaii.rr.com

Dear Mr. Timpson:

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

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

As described in Section 2.5.10, Project Phasing, and further in Section 8.6.9, Construction Phasing, in the 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. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

- *Match the anticipated schedule for right-of-way acquisition and utility relocations.*
- *Reduce the time that each area will experience traffic and community disturbances.*

- *Allow for multiple construction contracts with smaller contract size to promote more competitive bidding.*

- *Match the rate of construction to what can be maintained with local workforce and 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.

The FTA and DTS appreciate your interest in the Project. The Final EIS has been issued in conjunction with the distribution of this letter. You may view the Final EIS on the Project website at www.honolulutransit.org. You may request a DVD of the Final EIS and additional content through the "Contact Us" tab on the website or by calling the Project hotline at 566-2299. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-333550

Ms. Veronica Tuia
P.O. Box 31029
Honolulu, Hawaii 96820

Dear Ms. Tuia:

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

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

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been

completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330380

Mr. Dan Weissmann
3932 Spencer Street
Keller, Texas 76248

Dear Mr. Weissmann:

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

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

Chapter 2 of the Final EIS summarizes the alternatives screening and selection process. Beginning in the fall of 2005, an initial screening process considered alternatives identified through previous transit studies, a field review of the study corridor, an analysis of current population and employment data for the study corridor, a literature review of technology modes, ongoing work completed as part of the Oahu Regional Transportation Plan 2030 (ORTP) prepared by the Oahu Metropolitan Planning Organization (OahuMPO) (OahuMPO 2007), and public and agency comments received during the formal Alternatives Analysis scoping process.

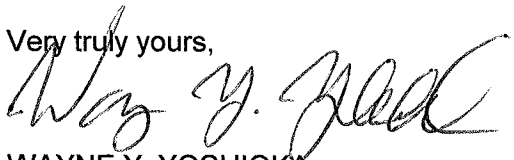
The screening process is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS 2006a). Three scoping meetings were held during the screening process in December 2005, which included a presentation of initial alternatives to the public, interested agencies, and officials to receive comments on the Purpose and Need, alternatives, and scope of the Alternatives Analysis. Refinements were made to the alternatives based on the public input during scoping.

After completion of screening in the winter of 2006, the following alternatives were studied in the Alternatives Analysis: No Build Alternative, Transportation System Management (TSM) Alternative, Managed Lane Alternative, and the Fixed Guideway Alternative. After review of the Alternatives Analysis Report and consideration of public comments, the City Council identified a fixed guideway transit system extending from Kapolei to UH Manoa with a connection to Waikiki as the Locally Preferred Alternative. This identification, which eliminated the TSM and Managed Lane Alternatives from further consideration, became Ordinance 07-001 on January 6, 2007. The NEPA process considered a range of alternatives that was consistent with the identified Locally Preferred Alternative. As discussed in Section 2.2, there were no alternatives that had not been previously studied and eliminated for good cause that would satisfy the Purpose and Need at less cost, with greater effectiveness, or less environmental or community impact.

As documented in the Alternatives Analysis cost estimate, the cost of an underground system would have been substantially greater than that for an elevated system.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU
DEPUTY DIRECTOR

June 11, 2010

RT9/09-330576

Mr. Kenneth Yoshida
1516 Hoolehua Street
Pearl City, Hawaii 96782

Dear Mr. Yoshida:

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

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

Several alignments were considered during the Alternatives Analysis, including an alignment serving both the Airport and Salt Lake areas. Challenging issues associated with directly serving the Airport, including crossing U.S. Department of the Navy property and crossing the H-1 Freeway, made such options impractical. Also, crossing Navy property was rejected by the Navy.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-299053R

Resident
650 Sheridan Street, #107
Honolulu, Hawaii 96814

Dear Resident:

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

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

Many pedestrians currently use the network of sidewalks in the Ala Moana-Sheridan neighborhood. The pedestrian volume in the neighborhood will continue to grow with or without the Project. Those walking to the station from surrounding areas will use the existing network of sidewalks. As stated in Section 2.5.5 of the Final EIS, design criteria developed for stations place highest emphasis on walk and bicycle access. Pedestrian access to stations, including accessible routes, shall be given first priority for reasons of safety.

It is estimated that most passengers using this station will transfer to or from buses directly on Kona Street. Those walking to the station from surrounding areas will use the existing network of sidewalks. Bicyclists will access the station via existing streets and/or sidewalks in the area. The station will be designed to accommodate the expected volume of pedestrians and will provide parking for bicycles.

As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures to enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined in Final Design through these coordination efforts.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Individuals, Groups, and Organizations

The following letter was inadvertently left out of Appendix A; however the response letter was mailed to the recipient.

- Elizabeth Sataraka

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT9/09-332979

Ms. Elizabeth Sataraka
Good Samaritan Church of Jesus Christ
99-545 Opukea Street
Aiea, Hawaii 96701

Dear Ms. Sataraka:

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

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

While each of the alternatives discussed in the Draft EIS includes trade-offs between benefits and impacts, the Airport Alternative from East Kapolei to Ala Moana has been selected as the Preferred Alternative as described above. As compared to the alternatives discussed in the Draft EIS, the Airport Alternative will carry the most passengers, provide the greatest transit-user benefits, and result in the fewest vehicle hours of delay. It will provide access to employment centers at Pearl Harbor Naval Base and Honolulu International Airport and will serve the Salt Lake neighborhood with connecting bus service. Of the three Build Alternatives addressed in the Draft EIS, the Airport Alternative will have slightly less impacts to the natural and built environment analyzed in the Draft EIS. During the public comment period on the Draft EIS, the public overwhelmingly supported the Airport Alternative. Of the comments that specifically supported one of the alternatives, more than 75 percent were in support of the Airport Alternative. For more information this selection is discussed in Section 2.4 of the Final

EIS. Since publication of the Draft EIS, design has been advanced, further analysis has been completed, and information has been added in response to comments on the Draft EIS and agency coordination. The Final EIS discusses the process that was used to select the Preferred Alternative, how comments were considered in the decision-making process, impacts and mitigation commitments.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

Individuals, Groups, and Organizations

Several response letters were inserted in the wrong location in Appendix A. The following letters have been included in this errata file:

- The Kamehameha Schools response letter appeared in the wrong location; it has been placed correctly at the end of the corresponding submittal letter.

- The Life of the Land response letter originally appeared after the Taulagi Leano letter in Appendix A; it has been placed correctly at the end of the corresponding submittal letter.

- The UltraSystems response letter appeared in the wrong location; it has been placed correctly at the end of the corresponding submittal letter.

KAMEHAMEHA SCHOOLS

February 6, 2009

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

Re: Comments on the Draft Environmental Impact Statement/Section 4(f) Evaluation ("***DEIS***") for the Honolulu High-Capacity Transit Corridor Project ("***Project***")

Dear Messrs. Matley and Yoshioka:

Thank you for the opportunity to comment on the DEIS for the Project.

As a brief background, Kamehameha Schools (***"KS"***) is a charitable educational trust, founded in 1887 through the Will and Estate of Princess Bernice Pauahi Bishop, whose mission is to provide educational opportunities to improve the capability and well-being of Native Hawaiians. KS currently offers a wide range of educational programs and services, including K-12 campus programs, preschools, financial aid, outreach programs, community education and collaborations with schools and community organizations. This past year, KS' programs and services reached more than 38,000 Native Hawaiian children and families.

In addition to providing educational programs and services, KS owns and maintains, as an important part of its ancestral and cultural legacy, over 365,000 acres of privately-held lands in Hawai'i. These lands are part of an endowment that provides the financial resources necessary to support these educational services and programs. As a Native Hawaiian educational organization, landowner and community member, KS has worked and continues to strive to work collaboratively with government, businesses, community organizations and others on solutions to the difficult challenges facing our families and communities, such as education, employment, housing, energy, food supply, sustainability, transportation and quality of life.

KS supports a rail transit system on Oahu as a long-term transportation solution. A rail transit system can provide a tremendous benefit to our communities by alleviating traffic congestion, reducing the use of fossil fuels, curbing urban sprawl, spurring development of communities and revitalizing our economy. We commend the City and County of Honolulu and the Federal Transit Administration for their hard work in initiating and carrying forward this important transit project and are appreciative of the extensive effort of our City leaders and their staff to study and publicize the impacts of this project.

We received a copy of the DEIS for the Project and understand that our role or kuleana in this prescribed process is to review the DEIS and provide productive comments to help best assure the Project's successful completion. We have taken this responsibility seriously. We met with tenants and other business owners and operators on KS lands who occupy properties potentially affected by the Project to become familiar with their concerns and interests. We also retained consultants to provide us with an independent review of specific aspects of the Project. The review of the thousands of pages of highly technical materials of the DEIS has taken time, and we appreciate your efforts in providing an extension of time for responses. It has made a meaningful difference in the quality of our review.

From this review, we have found many positive aspects to the DEIS and the proposed system. We have also identified, which is understandable in a document of this complexity, some items that we believe require additional study and work. In preparing our comments on those items, we have considered the potential impacts to our lands and our ability to continue to fulfill our educational mission with the returns generated from our lands; the potential impacts on the hundreds of small-and large business tenants and individuals on our lands; the potential impacts on communities where KS is diligently planning redevelopment and revitalization measures; and as appropriate, the broader potential impacts on our communities and families. In addition, we have tried to make our comments specific, productive and solution-oriented so that you may more easily address concerns with the appropriate particulars and move ahead with a successful project.

Our comments to the DEIS are set forth in full in **Attachment A** to this letter.

We thank you again for the opportunity to participate in this process and look forward to continuing to work collaboratively with the City to help assure the timely success of this important project, which will benefit our families and communities for many generations.

Mahalo.

Very truly yours,

Kirk Belsby
Vice President, Endowment
Kamehameha Schools

Enclosures

ATTACHMENT A

Kamehameha Schools ("***KS***") appreciates the opportunity to comment on the Draft Environmental Impact Statement/Section 4(f) Evaluation ("***DEIS***") for the Honolulu High-Capacity Transit Corridor Project ("***Project***") prepared by the City and County of Honolulu (the "***City***") Department of Transportation Services ("***DTS***") and the Federal Transit Administration ("***FTA***"). In order to provide comments that are helpful toward the success of the Project, KS retained consultants to conduct in-depth assessments of specific aspects of the Project. UltraSystems Environmental ("***UltraSystems***") was retained to provide a technical review of the Project and CBRE Consulting, Inc. ("***CBRE***") was retained to analyze the economic impact of the proposed Project. This process has enabled KS to offer the following comments on the Project and the DEIS.

I. IMPACTS OF CONSTRUCTION ON BUSINESSES

KS estimates that construction of the Project could affect over one hundred of its properties and approximately one thousand of its tenants and sub-tenants, and their businesses.[1] Research by CBRE indicates that businesses along the construction routes of major rail systems experience significant losses. While some disruption during construction is unavoidable, losses can be minimized if positive mitigation measures are taken.

A. Physical Impacts

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.

1. **Information.** Although section 4.17 of the DEIS contains a discussion of construction phasing effects, a more detailed discussion of anticipated construction impacts and the scheduling of construction activity would help businesses understand the full extent of construction-related impacts. Information such as the following is requested: (a) the number of businesses directly affected by construction activity (*i.e.*, businesses located adjacent to a construction site and on property to be acquired by the City) and indirectly affected (*i.e.*, within one mile of a construction site), (b) for various segments of the line, a more detailed estimate of the length of the construction period from commencement to conclusion of construction, including any time needed to relocate utilities prior to the commencement of construction on the actual rail system, and (c) the proposed location of construction barriers, the amount of time that barriers will be in place, specific land and street closings, and rerouted traffic patterns during construction.

2. **Concerns about Construction Activity.** KS shares in the concern noted in the DEIS that construction will disrupt traffic and limit access to and from businesses in various ways. See DEIS section 3.5.3 at 3-46 and section 4.17.1 at 4-153 to -154. In some cases, direct access to businesses will be lost or curtailed. Construction will also result in loss of available parking.[2] The erection of fences around construction sites will diminish the visibility of certain businesses, thus reducing customer traffic. Even if a business maintains visibility during construction, there is a general tendency for people to avoid aesthetically unappealing construction sites, or avoid construction areas where traffic flow will be seriously compromised. KS is also concerned that construction will disrupt utility service during the length of the construction period, which KS understands could last from one to five years. More detail of these impacts by neighborhood is requested.

3. **Mitigation Measures.** The DEIS proposes a mitigation plan that touches upon some of the physical impacts of construction. The DEIS states that a Maintenance of Traffic ("***MOT***") Plan and

Transit Mitigation Plan ("***TMP***") will be developed to identify measures to mitigate temporary construction-related effects on transportation. See DEIS section 3.5.7 at 3-48. The DEIS discusses the goals that the MOT Plan and TMP should achieve. Building upon that discussion, the objectives of the MOT Plan and TMP could be advanced by inclusion of the following:

(a) Agreements by project construction contractors that they will (i) ensure by necessary means (including phasing of the work) that access to businesses in the project area be maintained during project construction activities, (ii) coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area – especially those with seasonal or high sales periods, (iii) minimize, as practical, the duration of modified or lost access to businesses in the project area, (iv) provide advance notice when utilities are to be disrupted especially if disruptions will be during regular business hours, and schedule major utility shut-offs during non-business hours; (v) keep roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking; (vi) during dry periods, apply water to exposed soils to minimize airborne sediment; (vii) properly maintain construction equipment to minimize unnecessary exhaust; (viii) locate stockpile areas in less visibly-sensitive areas and, wherever possible, place them in areas that are not visible from the road, or by residents and businesses; (ix) remove visibly obtrusive erosion-control devices (*e.g.*, silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized; (x) replace street trees and other vegetation that must be removed with appropriately sized vegetation; (xi) to the extent feasible, have the concrete decking along the cut-and-cover segments installed flush with the existing street or sidewalk levels; (xii) wherever feasible, maintain sidewalks at their current width during construction and where a sidewalk must be temporarily narrowed during construction (*e.g.*, deck installation), restore to its current width during the balance of the construction period; (xiii) construct site fencing of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation; (xiv) where major boulevards must be fenced, offer the business owners the opportunity to request covered walkways in lieu of chain-link fencing; (xv) where covered walkways or solid surface fences are installed, implement a program to allow for art work (*e.g.*, by local students) on the surface; and (xvi) where used, maintain in clean repair chain link fences.

(b) Provisions for public information campaigns to inform the community that businesses are open during project construction activities to encourage their continued patronage, including advertising of businesses.

(c) Provision for a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities and to understand their needs, and to appropriately address them, including (i) interviews of individual businesses potentially affected by construction activities to understand how these businesses carry out their work, and (ii) identifying business usage, delivery, and shipping patterns and critical times of the day and year for business activities, as well as alternate access routes to maintain critical business activities.

(d) Provisions for a program to (i) convey construction information to the community, (ii) provide public information (*e.g.*, press releases or newsletters) regarding construction activities and ongoing business activities, (iii) enable the community to "speak" to the appropriate persons at the FTA and the Rapid Transit Division of DTS ("***RTD***") during construction with a specific process for responding to community concerns in a timely manner, and (iv) install appropriate signage and lighting, and display other information to indicate that businesses in the construction area are open, and to direct both pedestrian and vehicular traffic to businesses via alternate routes.

(e) Provisions for a Business Disruption Mitigation Plan ("***BDMP***") whereby the FTA and RTD will work with community residents, elected officials, local businesses, and community

organizations to tailor the mitigation program to meet community needs prior to the commencement of construction activities. KS requests that the BDMP (i) include remedies for business owners if the measures in the BDMP are not observed, (ii) be readily available for public review, (iii) have a process to inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting, (iv) identify a staff person to work directly with the public to resolve construction-related problems, (v) provide for a field office during construction of the Project to address the matters described above, (vi) provide for an information and voice mail telephone line for community members and businesses to express their views regarding construction, with calls received reviewed by FTA and RTD staff and, as appropriate, forwarded to the necessary party for action (*e.g.*, utility company, fire department, resident engineer in charge of construction operations), and (v) provide for traffic management plans as described above.

B. Economic Impacts

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

1. Impact on Businesses. KS requests expansion of the economics impact analysis in the DEIS.[3] Presently, the DEIS provides discussion on (a) the effect of the Project on regional economics in the study corridor, including employment trends, growth, and real property tax; (b) the effect of construction on land use and economic activity; and (c) indirect effects of the Project on economic development, particularly focused on opportunities for transit-supportive development (***"TSD"***) and transit-oriented development (***"TOD"***). KS suggests supplementing the discussion with an analysis of the economic impacts of the Project (both during and after construction) from the perspective of businesses and property owners along the rail line. For example, the impact of business closures or revenue losses should be added to the economic impacts analysis. As discussed further below, research conducted by KS' consultants regarding other transit projects indicates that construction of the Project could lead to the demise of a significant number of businesses.

Case studies of other major rail systems indicate that businesses situated along and surrounding the construction route can experience significant losses such as declines in customer numbers, sales, and in some cases, the closure of businesses. One of the most dramatic cases of this type of negative impact was in Salt Lake City, where an estimated 30 percent of local businesses closed during the construction of the TRAX system, and there were no mitigation strategies planned beforehand to reduce the impact on the businesses.

A similar situation occurred during the construction of SkyTrain's Canada Line in Vancouver. No public subsidies were provided to retailers and some businesses claimed that revenues dropped by 70 percent. On average, 40 to 60 percent losses in revenue have been reported. As of 2007, less than a year into construction, it was reported that between 40 and 60 businesses along the line had closed, with more likely to follow, as completion of the project is not expected until 2009.

If the Project will have similar economic impacts as the case studies discussed above, the economic loss to KS, its tenants, and their businesses will be significant. Negative impacts of construction could be further exacerbated due to the current economic climate that is already challenging the viability of many businesses.

2. Independent Study. In light of the physical and economic impacts referenced above, KS requests that the City retain an independent urban economist to conduct a study of the economic impacts of the Project both during and after construction. The geographic scope of the study should extend beyond the areas immediately adjacent to construction because the impacts can have a blighting

effect on the surrounding community as well. The independent analysis should be based on case studies and empirical data taken from other communities with particular emphasis given to elevated transit systems similar to that proposed for Honolulu. It would also be helpful to study alternative systems (*e.g.*, at-grade) and routes to determine if these alternatives mitigate the expected pre- and post-construction impacts.[4] KS requests that the public, which has not had the opportunity to review the items, be given the opportunity to review and comment on the study before it is incorporated into the Final EIS.

3. **Public Assistance Programs and Other Mitigation Measures.** Case studies indicate that public assistance is essential to keeping businesses viable during construction. During the construction of Interstate MAX-Yellow, an extension to Portland's light rail network, the transit agency Tri-Met and Cascadia Revolving Fund came together to provide assistance to affected businesses. The businesses who received assistance had to demonstrate that the construction had negatively impacted their business revenues. The success of this program is illustrated by the fact that during construction, ***only one business of the 106 businesses located along the length of the light rail route closed as a direct result of construction, and only two businesses moved to another location.*** For the development of another extension of the light rail line, Tri-Met started the Business Support program for ground-floor retail businesses along the light rail construction route that may be disrupted due to their reliance on established pedestrian and transit traffic.

Salt Lake City is an example of a city that has learned from its experience of not investing in a public assistance program. When Salt Lake City built its first light rail line in 1999, nearly 30% of the businesses along the rail line closed. No mitigation strategies were planned beforehand to reduce the impact on the businesses. When the University Line extension was built in 2001, however, Salt Lake City sponsored a low interest loan program available to impacted businesses, which materially reduced business closures and economic impacts.

The case studies above highlight that well-conceived mitigation and public assistance can be effective in keeping businesses intact. Programs that we respectfully request for consideration include:

- Outright assistance
- Relocation assistance
- Rent subsidies
- Property owner compensation for lost rents
- Publicly funded business advertising and promotions
- Temporary real property tax relief

II. POTENTIAL PARKING IMPACTS OF COMPLETED SYSTEM

Availability of parking is important to the success or failure of the Project. Transit users who drive to stations will require parking or else be deterred from using the rail system. Thus, KS recommends that the City study and estimate the amount of parking that will be available to rail users and motorists in areas near transit stations after the Project is built.

A. Potential Parking Impacts

Comment #3: Inadequate parking for the Project will have economic consequences on surrounding businesses and properties.

U.S. transit systems often encounter problems with providing enough off-street parking and park-and-ride lots. This results in various adverse impacts to owners with businesses and properties located near transit stations.

First, transit riders may be forced to find on-street parking, thus increasing traffic congestion in the area surrounding a transit station and/or park-and-ride lots, disrupting traffic flow, and reducing the number of street parking spaces available for non-transit users. Scarcity of parking can also be a deterrent to use of the rail system.

Second, transit users might park illegally in private retail and business parking areas, thus limiting further actual customer parking and/or increasing the cost of parking enforcement for business and property owners. An overall reduction in the amount of available parking spaces either on the street or in dedicated customer parking will discourage customers from patronizing businesses in the area.

Third, the uncertainty of the supply of parking negatively affects property owner redevelopment plans due to (i) concerns that additional lands may be condemned to provide for parking if ridership forecasts are achieved (or if ridership forecasts are not achieved and the agency determines a lack of parking availability to be the cause), or (ii) concerns that private property owners will be forced to mitigate the parking shortfall without public assistance. As acknowledged in the *Land Use Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008b) dated August 15, 2008 ("***Land Use Technical Report***"), KS owns many properties near the proposed Pearlridge, Kapalama, Kaka'ako, and Mo'ili'ili stations and intends to engage in redevelopment of those properties when the current leases expire. See *Land Use Technical Report* at 5-2 to 5-11. Therefore, these are important concerns to KS.

KS offers the following comments to assist the City in the refinement of its parking plans:

1. **Quantify parking needs at each transit station in the Final EIS:** Planning for parking needs begins with quantifying the number of parking stalls required for each rail station.

2. **Kapalama Station:** It appears that the City does not plan to build additional parking spaces for users of the Kapalama Station. See DEIS at 2-31. It is unclear where users who drive to this station can park. KS requests that the Final EIS discuss the impact on commercial tenants adjacent to this station if no off-street parking is provided to station users and the empirical basis for the determination that no station parking facilities are required.

3. **Dillingham Boulevard from Kohou Street to the rear parking lot of Costco:** On the mauka side of the roadway, the DEIS provides that all through and left-turn lanes would be preserved by acquiring 10 feet of additional right-of-way on the makai side of the roadway. What traffic impact will the acquisition of an additional right-of-way have on parking for existing land uses where ROW is acquired and what mitigation is proposed? See *Transportation Technical Report Honolulu High-Capacity Transit Corridor Project* (2008a) dated August 15, 2008 ("***Transportation Technical Report***"), Table 5-32, at 5-85.

4. **Halekauwila Street from Nimitz Highway to Ward Avenue:** Most of the existing on-street parking would be removed. What impact would this have on existing off-street parking spaces for the commercial uses located along Halekauwila Street and what mitigation is proposed? See *Transportation Technical Report*, Table 5-33, at 5-86.

5. **Dillingham Boulevard from McNeill Street to Kohou Street:** Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street to Waiakamilo Road due to fixed guideway column placement in the median. Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road to Kohou Street due to fixed guideway column placement on the side. See *Transportation Technical Report*, Table 5-54, at 5-114. The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. KS requests that the Final EIS discuss the impact of the loss of these off-street

parking spaces on the commercial uses located on KS lands along Dillingham Boulevard and any proposed mitigation.

6. **Halekauwila Street from Keawe Street to Coral Street:** Sixteen on-street mauka and 22 on-street makai parking spaces would be lost on Halekauwila Street between Keawe Street to Coral Street due to fixed guideway column placement on the side. See *Transportation Technical Report*, Table 5-54, at 5-114. KS requests that the Final EIS discuss the impact of the loss of these on-street parking spaces on businesses located on KS owned properties and any mitigation proposed.

B. Mitigation Measures For Parking

Comment #4: The City is requested to develop more specific mitigation measures for parking.

KS notes that mitigation measures were included in the DEIS to address this issue, including the establishment of a neighborhood parking plan, but KS suggests the following additional measures:

1. **Early planning.** The DEIS appears to contemplate developing mitigation strategies for parking after significant commitments of resources have been made for the design and construction of each transit station. This is indicated by the fact that section 3.4.5 of the DEIS states that mitigation strategies for parking would be determined by surveying stakeholders within six months before implementation of fixed guideway service. See DEIS at 3-44. KS requests that specific parking strategies be devised and studied as part of this environmental review process.

2. **Parking study.** To ensure that parking impacts are fully addressed in the Final EIS, KS recommends a detailed parking study be performed for each transit stop that is predicated on the level of transit use occurring at each station and validating through more rigorous analysis how these users will access the site (*e.g.*, pedestrian access, transit access or vehicular access). Once the study is concluded, specific mitigation measures should be developed based on the results of the study and incorporated into the Final EIS.

3. **District parking solution.** District parking garages could be developed near rail stops and paid for through transit system funding. Such systems should be located with a view toward improving transit use and facilitating redevelopment within TOD corridors.

4. **Public assistance for building parking structures.** A program of subsidies, grants, or other assistance for the construction of parking structures could be provided. For example, Portland recently approved a $6.6 million subsidy for a parking garage for a TOD.

5. **Signage and parking permit program.** Adequate signage could be installed during and after construction for transit-parking areas and alternate business parking areas. A parking permit program could be created for on-street parking to limit impacts on local businesses by transit users monopolizing on-street parking.

III. IMPACTS OF COMPLETED SYSTEM ON BUSINESSES ALONG RAIL LINE AND AT TRANSIT STATIONS

KS owns properties containing approximately 229 acres in communities that would be directly affected by the rail system along Farrington Highway, Kamehameha Highway, Dillingham Boulevard, and Halekauwila Street in Kaka'ako. KS is concerned that the Project will affect visibility of and access to the businesses on KS' properties; limit the redevelopment options available to KS and other landowners; and narrow streets, among other impacts.

A. Physical Impacts

1. Traffic, Visibility, and Access to Businesses

Comment #5: A more detailed assessment of the reduction in visibility and access to businesses and potential mitigation measures is requested.

a. Visibility. Presently, a significant percentage of KS' land holdings along the Project route are used for retail. Retail properties require good visibility to be successful. As the DEIS acknowledges on page 4-59, "*[b]usiness owners* have a vested interest in the visual environment surrounding their operations." KS is concerned that the elevated guideway will substantially reduce the visibility of businesses from the street level. As such, the discussion of visual impacts in the DEIS[5] should be expanded beyond impacts on views of "landmarks, significant views and vistas, historical and cultural sites, and Exceptional Trees." DEIS at 4-59. Impacts to visibility of businesses located along the rail line also should be considered.

b. Access. Businesses also depend on convenient access to and from their properties. The erection of the elevated guideway and its supporting columns, however, will eliminate left turn lanes, thus cutting off direct access to many businesses, requiring potential customers to take a circuitous route. Traffic patterns and the level of service in affected areas might change as a result. Added congestion would further discourage customers from visiting businesses along the guideway. As a related matter, to the extent the Project permanently eliminates existing street parking due to placement of the transit guideway, all of the parking-related impacts noted in **Comment #3** above become issues. Again, the number of parking spaces needed for each transit station needs to be determined carefully to prevent loss of business due to customer parking being occupied by transit users.

c. Narrower Lanes. The DEIS notes that in certain places, the widening of existing street medians to accommodate the columns would require reducing lane widths. See DEIS, Table 3-21, at 3-39; *Transportation Technical Report*, Table 5-29, at 5-80. Narrowing of lanes could increase the risk of traffic accidents. KS suggests that the Final EIS study such risk. KS specifically requests more information on the impact of reduction in lane widths to traffic on the following roadways that are aligned next to its properties, including (a) Farrington Highway and Waipahu Depot Road; (b) Kamehameha Highway and Kuleana Road; (c) Kamehameha Highway and Ka'ahumanu Road; (d) Kamehameha Highway and Kaonohi Street; (e) Kamehameha Highway and Lipoa Place; and (f) Kamehameha Highway and Pali Momi Street. A discussion of the impacts of lane narrowing on industrial uses (travel of large vehicles such as semi-trucks) in the Final EIS is particularly needed given the industrial uses in many of the impacted communities.

d. Mitigation. KS requests adoption of a mitigation plan that will (a) ensure there is adequate parking near transit stations; (b) maintain access to and from businesses; (c) maintain traffic circulation; (d) prevent traffic accidents; and (e) minimize loss of visibility due to the elevated system. To achieve these objectives, a detailed mitigation plan incorporating specific initiatives should be developed and incorporated as part of the Final EIS. Examples of the types of elements that might be incorporated into the mitigation plan include: (i) traffic signals with protected left turns at busy intersections; (ii) elongated left turning lanes off of the main roadways to accommodate the increase in motorists utilizing left turn lanes at busy intersections, and to alleviate backup along the main roadways; (iii) district parking near rail stops paid for through transit system funding; and (iv) update and supplement the traffic study contained in the *Transportation Technical Report* to address the comments stated above.

2. Noise and Vibrations

Comment #6: Disclosure of noise and vibrations and their impact according to time of day.

It is our understanding that the noise analysis contained in the DEIS is based upon average hourly noise impacts rather than noise impacts at different times of the day. However, noise impacts can vary in significance depending on the time of day. For example, the impacts relative to background conditions may be more significant between 4:00 a.m. and 6:00 a.m. than during mid-day periods. Because these time-of-day differences may impact current and future uses differently, more complete disclosure of noise impacts by time of day is needed.

Assuming the DEIS used the noise impact criteria in the FTA's *Transit Noise and Vibration Impact Assessment* manual as the standard against which to evaluate noise exposures due to the Project, the impacts of noise on commercial should be studied further.

The noise sampling methodology utilized in the DEIS appears to be specific to ground level impacts. Because sound rises, there will be greater impacts on buildings (either existing or to be constructed in the future) that are constructed at heights above the proposed rail line. KS could not find discussion of these conditions in the DEIS and how the noise impacts of an elevated system might affect the viability of future TOD proximate to the rail line, particularly for uses that are noise sensitive such as residential.

3. Security, Transients, and Crime

Comment #7: Additional disclosures on security, transients, and crime are requested with more specific mitigation measures.

The Final EIS should disclose that in urban areas with hot and wet climates, such as Miami and Honolulu, elevated lines can provide shelter for the homeless, increasing crime and litter and thereby detract from commercial activity and result in lower property values. Transit stations also tend to attract graffiti.

The availability of parking and safety are interrelated issues. If parking is not available near transit stations, riders will need to find off-street parking within the district or travel to stations by walking. Without addressing the issue of security patrolling and providing ample parking in safe areas, riders will not want to park multiple blocks away and walk, especially at night, in order to get to and from the rail station and their vehicles.

The DEIS does not detail mitigation options to reduce concerns raised about area crime, property vandalism and an increase in transient persons using the elevated system as temporary shelter. KS requests the Final EIS provide specific mitigation actions to be undertaken. The mitigation measures could include: (a) use of landscaping and/or security fencing to minimize the ability of transients to assemble underneath the elevated rail lines; (b) adequate security on staff (dedicated security and/or Honolulu police) to patrol the stations and surrounding areas; (c) installation of surveillance cameras and equipment, emergency call boxes, and closed-circuit television monitoring; (e) locating police neighborhood substations at transit stations; (f) conducting regular maintenance and cleaning of areas under the rail line, transit stations, and surrounding areas; and (g) designing and installing structures underneath elevated rail lines that would discourage or prevent loitering by transients.

4. Visual and Aesthetic Impacts

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.

a. Visual Blight. An elevated system with platforms will cause visual blight. The elevated guideway will also cast shadows on adjacent buildings, reducing visibility. Glare and excessive lights from the rail line could adversely impact certain businesses during the day. Visual blight will also occur from deterioration of the system over time. These visual and aesthetic impacts may reduce tenant or customer interest in the area, increase turnover, and decrease property values. Thus, KS requests that the Final EIS include discussion of the estimated economic loss that visual impacts will cause, specific measures for mitigating such impacts, and the mechanisms for soliciting public input on mitigation measures.

b. Expanding Study.

i. The *Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project* (2008e) dated August 15, 2008 (the "***Visual and Aesthetics Resources Technical Report***") utilized the methodology of the Visual Impact Assessment for Highway Projects[6] of the Federal Highway Administration ("***FHWA***") for the Project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The *Visual and Aesthetics Resources Technical Report* discusses how viewer groups have been categorized (*i.e.*, residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. See *Visual and Aesthetics Resources Technical* Report at 3-2. However, the analysis provided in section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. KS suggests that the Final EIS provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points. We recommend that the viewer exposure response include focus groups and outreach that encompasses a broad range of stakeholders. Property owners are not included among the five user groups asked to comment on visual impacts, but should be.

ii. The expanded study should also provide 360-degree visuals for multiple cross-sections of the rail line with particular emphasis given to transit stops. To provide representative visual imagery of the Project, such 360-degree studies should include areas within the urban core and areas within the suburban landscape. We would also recommend showing these images at multiple levels for each representative cross-section, including at street grade and at elevations of 2 to 3 stories.

c. Utility Relocation. The DEIS notes that the Project would involve relocation and modification of existing utilities. See DEIS at 4-38. KS is concerned about the impacts that relocating above ground power and telephone lines will have on existing commercial properties that are located on KS owned land in the Dillingham Plaza area and the area to the north and south of this property. Since ten feet of land in front of these commercial uses will be acquired to allow for widening of the median in this street, it is assumed that existing above-ground poles and power/telephone lines along this street will be moved back ten feet, bringing them even closer to these commercial uses, which include the Boulevard Saimin restaurant,[7] Sizzler restaurant, Burger King fast food restaurant, Popeye's Chicken fast food restaurant, and other uses along this street. Bringing utility lines even closer to existing commercial uses will detract from the appearance of these uses and limit access to the properties and the ability to maintain the properties in good repair.

d. Other Mitigation Measures. The *Visual and Aesthetics Resources Technical Report* does identify a number of principles for minimizing, reducing, or mitigating impacts, including those related to construction. See *Visual and Aesthetics Resources Technical Report* at 6-1 to 6-2. KS generally agrees with the stated objectives, but recommends development of specific mitigation actions that will ensure substantive results. The following are the types of specific and measurable mitigation actions that could be included, although a more detailed list should be developed as these measures below would address only a limited number of the expected impacts that will arise: (a) consultation with the communities surrounding each station for input on station design elements; (b) cooperative agreements with adjacent property owners that would improve the Project's visual quality; (c) where practicable, retention of existing street trees along sidewalks and in medians, or plant new vegetation to help soften the visual appearance of project elements (*e.g.*, stations, guideway columns, and TPSSs); and (d) use of source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas.

B. Economic Impacts

1. Business Impacts

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.

As noted in Section I above, KS requests that the Final EIS incorporate an expanded study of the economic impacts of the Project on businesses conducted by an independent urban economist. In addition to analyzing the impact of construction on businesses, the study should include an assessment of the business impacts of the completed system across a range of property types along the rail line. The analysis should result in quantifiable projections of lost revenue for current and future uses along such systems (both at transit stop locations and between transit stop locations), and business failures, and should be based on case studies of other jurisdictions where an elevated heavy rail technology is chosen rather than a light rail at-grade system. It might also be helpful to analyze the impacts of other rail systems (*e.g.*, at-grade systems) and routes to compare the relative impacts of these alternatives. Once the impacts are identified using these empirical methodologies, the Final EIS should detail mitigation options and how these mitigation options reduce impacts on businesses.

2. Redevelopment

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

An elevated rail system will affect KS' and other landowners' redevelopment plans by limiting the kinds of projects that can be feasibly built on lands adjacent to the rail line. New buildings constructed along the rail line would have to plan around blocked viewplanes, noise emanating directly from trains, and the aesthetics of an elevated line and transit station. To compensate for the low demand for second or third level residential or office space and restricted view planes, buildings would have to be constructed at a minimum height if adjacent to the rail system. This will, of necessity, require greater verticality in future redevelopment, which will have broader community impacts and increase construction costs.

One example of the impact of buildings adjacent to elevated rail lines is the Los Angeles Green Line. A portion of the Green Line runs on an elevated line with several stations near major office buildings and hotel projects. The elevated portion is similar to the Project, except that it is no more than

25-30 feet above grade, and the concrete Y-beam is only 24-25 feet wide. There are no retail properties along the route. One office building constructed in 1993 at the intersection of Rosecrans Avenue and Aviation Boulevard was located within 40 feet of the building's curtain wall. As a result of the obstructed view and noise, the developer experienced significant difficulty in leasing the office space on the second and third floors of the building's northeast corner. This space was the last to be leased, with the space remaining vacant for three years.

If an elevated system is selected, KS expects that buildings occupied by residents, tenants, or businesses would need to be set back to attenuate the effects of the adjacent rail system. Buildings would also be constructed on platforms above the rail line to compensate for noise, visual, and aesthetic impacts. As a result, construction costs would increase due to the increased height and the use of more expensive materials to provide soundproofing, and the potentially larger building area. These constraints effectively narrow the range of redevelopment options. It could be cost prohibitive, for example, to build relatively affordable residential units on lands fronting the rail line.

KS requests that the Final EIS analyze in greater detail the impacts of an elevated system on redevelopment. Since there are multiple references in the technical reports that future TOD could mitigate some of the negative conditions created by the transit line, we recommend that the Final EIS incorporate input from urban planning professionals, including a working group(s) from the Hawaii Chapter of the American Planning Association, the American Institute of Architects, the Urban Land Institute, or similar organization(s).

In a similar vein, KS recommends that the analysis of Project impacts on property values be revised and expanded to address the points in these comments. The DEIS anticipates that the Project will lead to an increase in property values due to the desirability of access to transit and TOD opportunities. KS' consultant's research indicates that such results may not necessarily be achieved. Further, in situations where desirable value outcomes are achieved, they seemed to have occurred in systems that are not comparable to the Project, such as at-grade designs.

IV. COST AND FINANCIAL ANALYSIS

Comment #11: Further study of the financial feasibility of the DEIS is suggested.

As a member of the community, KS has an interest in seeing that the feasibility of an economic undertaking as significant as the Project is thoroughly studied and based upon reliable data. The initial financial projections for the Project reported in Chapter 6 of the DEIS may not have taken into account (a) the recent economic downturn, the duration or severity of which is unknown, (b) potential additional project costs that may be necessary to mitigate impacts of the Project, including those items identified in this letter, (c) the State's recent announcement of major highway improvement projects intended to ease traffic congestion, which may affect ridership projections, and (d) cost overruns beyond the control of the governmental agency, which were experienced by other large-scale projects. In light of, and in evaluating, these types of financial issues, KS respectfully suggests that the City consider alternatives to building an elevated system. As discussed below in Section IX, building an at-grade system through at least portions of the route could be less expensive, may achieve the same transit objectives as an elevated system, and could also eliminate many of the impacts discussed in this letter.

V. IMPACTS OF LAND ACQUISITIONS ON KS, ITS TENANTS AND THEIR BUSINESSES

Condemnation or an acquisition by the power of eminent domain of KS' legacy lands, even partial acquisitions, impact KS, its tenants, and their businesses. More information on what areas and

interests will be acquired, when they will occur, and what interests will be compensated for would be helpful to KS and its tenants.

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.

1. **Additional Information.** The DEIS' recognition of the procedures for acquiring and compensating for properties taken and the disclosures to be made are helpful.[8] The *Real Estate Acquisition Management Plan* (RTD 2008q) (the "***RAMP***") is detailed and provides certain procedural protections. However, more specific information on the acquisitions and impacts of such acquisitions would assist KS and its tenants in evaluating how the acquisitions will affect their businesses, such as, (a) information on the size of the area that will be acquired, the size of the remaining area not being acquired[9], and the type of interest to be acquired[10]; and (b) confirmation that KS' and its lessees' buildings and other improvements will not be taken.

2. **Goodwill.** Businesses, especially small businesses operating from a location for many years, may develop valuable goodwill. "Goodwill" has been described as the benefits to a business as a result of its location, reputation for dependability, skill, or quality, and any other circumstances resulting in probable retention of old or acquisition of new patronage. The Model Eminent Domain Code and California's statute (Deering's California Codes Civil Procedure § 1263.510) provide for compensation to a business owner for the loss of goodwill. Neither the DEIS nor the RAMP discusses compensating a business owner for the loss of goodwill resulting from a full or partial acquisition (whether or not required by the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (CFR 1989) or other applicable statutory and case law). KS wishes to know whether the City intends to compensate a business owner for the loss of goodwill if the owner has to move because of reasons such as adverse impacts from construction activities, or the operation of the rail line, near the business.

4. **Economic Unit.** On a partial taking, it would seem to make sense to have parcels of land treated as a single parcel of land if they (a) are generally contiguous, (b) are in substantially identical ownership, and (c) are being used, or are reasonably suitable and available for use in the reasonably foreseeable future, for their highest and best use as an integrated economic unit.[11] That way, landowners and businesses are able to receive compensation for the diminution in value of the remainder parcel (the entire parcel excluding the portion acquired by the City) as the result of the Project. Clear guidance in the Final EIS on the treatment of parcels used as an economic unit and compensation for devaluation of the property not taken would assist KS, its tenants, and their business in evaluating whether they will bear a disproportionate burden of the impacts of the Project.

5. **Consequences.** The RAMP discusses the procedures for compensating property owners and businesses affected by full and partial acquisitions, however, KS' tenants and their businesses will be adversely affected if payments are delayed. In any such event, the aggrieved business owner has limited recourse against the City.[12] Consequently, it is suggested that the City consider including in the Final EIS a timetable for the City's compliance with the real estate process outlined in Appendix W and other portions of the RAMP (including the prompt payment of compensation after an agreement is reached) and measures to mitigate such harm caused to landowners and businesses such as a schedule of delay damages payable to the affected parties, interest on the amount due until paid, and reimbursement of reasonable attorneys' and experts' fees incurred by affected parties. In addition, to ensure fair treatment to landowners and businesses when offers of just compensation are made, condemned parties in other jurisdictions are reimbursed their attorneys' and experts' fees if the final offer price by the condemning agency is less than a certain percentage of the final judgment awarded by the court.

6. **Disclosure of Impacts.** The RAMP does provide for basic negotiation procedures where the agency is to "discuss its offer to purchase the property, including the basis for the offer of just compensation and explain its acquisition policies and procedures, including it[s] payment of incidental expenses in accordance with 49 CFR 24.106." See, § 4.B of App. W of the RAMP. However, it does not expressly require the City to disclose to the property owner or business the impact of the Project on the remainder parcel, including the business thereon, or the date by which payment will be made. It is requested that the basic negotiation procedures specifically include the City's disclosure of the impact of the Project on the remainder parcel, including construction disruptions, temporary and permanent access issues, noise, vibrations, etc., and compensation offered for such adverse impacts; and the date that compensation will be paid (in a pre-established schedule) and the consequences described above if payment is not made as scheduled.

7. **Subdivision.** Although the City is vested with the authority to approve the subdivision and consolidation of parcels of land, it does not usually exercise such authority when condemning property.[13] As such, it is requested that the RAMP (in sections describing closings) provide that on a partial taking, the City create subdivided parcels, including obtaining an order of the Land Court by the filing of the required petition and map, such that the parcel conveyed to the City and the remainder parcel are two separately subdivided parcels. Further, the City should permit the consolidation of a nonconforming (substandard) parcel with any adjoining parcel owned by or subsequently acquired by the condemnee.

8. **Non-conforming parcels.** When KS and its tenants have been left with a non-conforming parcel after acquisition by a governmental authority, they have not been able to obtain necessary building and other permits for renovation and/or redevelopment because of the non-conformity. It is requested that the City consider measures to allow reasonable development of non-conforming parcels created by the Project.

VI. KELO CONCERNS

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

KS believes that its properties, including its legacy lands, should not be taken through the government's exercise of its eminent domain powers and transferred to a private party for any use. In Kelo v. City of New London, 545 U.S. 469, 125 S.Ct. 2655, 162 L.Ed. 2d 439 (2005), the U.S. Supreme Court narrowly held in a 5 to 4 decision that a city could exercise its eminent domain power by transferring property from one private party to another to promote economic development. However, the U.S. Supreme Court emphasized that nothing in its opinion precluded any state or county from imposing stricter restrictions on its eminent domain power. Many states have already imposed standards stricter than the federal standard by constitutional amendments and legislation.

Any use of the eminent domain power to take KS' property for private development, even if it is in the context of a TOD (transit-oriented development) or TSD (transit-supportive development) would have adverse economic and social impacts on KS. It is requested that the City declare in the Final EIS that the City shall not use its power of eminent domain to take private property and subsequently transfer, by sale or otherwise, the use, ownership, or possession of the condemned property, or any portion thereof, to any person or entity for any economic development or redevelopment or any private use or development, including but not limited to industrial, residential, agricultural, commercial, hotel, resort, office, or retail use or development, whether to raise revenue or otherwise create value to help it meet financial needs for construction or operation of the Project.[14]

VII. TODs As Potential Mitigants

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.

A. Importance of Planning. Studies of other projects indicate that proactive planning efforts to allow high density residential and commercial development near stations are the primary cause of land value appreciation. An example cited for this is the SkyTrain system in Vancouver, where the local governments instituted long term regional planning to create new town centers around elevated transit stations. One such center is the Metrotown, a former light industrial and suburban single family neighborhood, which is reported to be home to over 6 million square feet of commercial and thousands of high rise residential units. Another example cited is the Pleasant Hill BART station area where over 2 million square feet of commercial and 2,300 residential units have been built on a 75-acre site since the mid-1980's. In both cases, rail transit was reported as the key driver behind planning and development efforts.

In contrast, where there is a lack of governmental assistance or coordination, the result may be decades of under utilized properties before any revitalization occurs. Even SkyTrain, as described above, has generated some negative impacts. Many stations have a poor reputation as magnets for crime. Development around elevated stations in the City of Vancouver has been hindered by NIMBYism and poor planning. It is reported that one year after the completion of the Expo line, the Ombudsman of British Columbia released a report addressing some negative impacts of SkyTrain, including noise, a harsh presence, loss of privacy and a depreciated enjoyment of lifestyle, all leading to reduced property values. Although in certain higher-density areas, home prices may increase near a station[15], multiple studies of rail projects show that property values decrease if located near a rail line or even a station.[16] In certain cases, with good planning and governmental assistance, these adverse economic impacts could be partially mitigated. Examining other projects should provide a sound basis for the City to improve upon the experiences of other cities.

B. Integrate Land Use Planning With the Project.

1. Study of other rail systems. To aid the City in identifying best practices in spurring TOD/TSD along the Project route, it is suggested that the City retain an independent urban economist to study other elevated, fixed guideway systems to evaluate and disclose both beneficial and adverse economic impacts on land values, including success stories where governmental assistance prevented or reversed decline. Public comments and input are recommended before the study is finalized.

2. TOD Ordinance. Furthermore, it is essential that the City enact a TOD ordinance. The DEIS has a limited discussion of TODs, but the *Land Use Technical Report* does contain a detailed discussion of land planning and a future TOD ordinance. It was anticipated that the City would develop and adopt a TOD ordinance by 2008. See, DEIS at 4-166. We remain hopeful that a bill will be introduced to the City Council in 2009. A TOD ordinance is appropriate before construction of the Project so that landowners can evaluate whether the ordinance will be an effective mitigant of the various impacts of an elevated system discussed elsewhere in this letter. In developing a TOD ordinance, consideration of the following is recommended:

a. Elements of successful rail projects. A study of rails systems shows that they all resulted in some negative impacts on surrounding properties, at least during construction; however, various aspects of each are also considered models for future TOD. Their success appears to be dependent upon: (i) the commitment of municipalities to employment and density; (ii) healthy real estate

market conditions; (iii) the interface and integration of rail and real estate concessions with adjoining TOD; (iv) careful phasing; and (v) public-private collaboration and the development of successful partnerships, including the establishment of the appropriate risk and revenue sharing mechanisms.

b. **Evaluation of other transit projects in other states.** Portland is often cited for having a strong planning component. It adopted policies on transit and land use that strongly encouraged TOD and is considered a model for successful development. It is reported that more than $6 billion in development has occurred along MAX lines since the decision to build in 1978. The positive land use impacts of Portland's transit system are due to both the impact of the transit system itself as well as aggressive state, regional, and local policy. Many financial subsidies were also provided to developers to build transit oriented development. While Portland remains, in the eyes of many planners, a strong example of successful transit oriented development, there are many critiques of the city and the impacts of MAX.

c. **Implement sound planning principles.** Studies show that sound planning includes (i) giving priority to development of a TOD ordinance to encourage development along the currently planned route and future transit stations; (ii) working with consultants and landowners to ensure appropriate zoning/land uses around stations; (iii) providing tools to ensure the district receives the intended development lift[17]; (iv) modifying subdivision and land use ordinances to allow non-conforming lots to be consolidated and re-subdivided and to allow issuance of renovation and redevelopment permits for non-conforming lots, both as discussed above; (v) integrating parking into TOD as described above; (vi) planning for and encouraging TODs because they do not automatically occur[18]; including possible real property tax breaks; (vii) developing a specific timetable for the adoption of a TOD ordinance; (viii) seeking and obtaining public input on a bill for a TOD ordinance[19]; (ix) ensuring that the permits to construct the TOD will be issued in a timely manner; and (x) to the extent the TOD ordinance is not adopted in a timely manner, ensuring that permits will be issued for pending developments and not delayed in anticipation of the TOD ordinance.

VIII. STUDY OF NORTH KING STREET ALIGNMENT

During the alternatives analysis phase of the NEPA/HEPA review process, the City considered two alternative alignments for the portion of the fixed guideway traversing through Kalihi and Iwilei, one aligned at North King Street and another at Dillingham Boulevard. The DEIS, however, only discusses the Dillingham Boulevard alignment. It appears that the North King Street alignment may not have been adequately studied before being eliminated as an alternative, and that there are advantages to a North King Street route that warrant it being re-examined.

Comment #15: Further study of the North King Street alignment is recommended

A further evaluation of the North King Street alignment may be warranted. In the initial stages of the environmental review process for the Project, North King Street was considered for the segment of the rail system traversing through Kalihi and Iwilei. The *Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project* dated October 24, 2006, and prepared by Parsons Brinckerhoff (***"Alternatives Screening Memo"***) listed five alignment options for this segment including elevated guideway alignments for North King Street and Dillingham Boulevard. See *Alternatives Screening Memo* at 4-17. By the time the City issued the *Alternatives Analysis Detailed Definition of Alternatives* (***"Detailed Definition"***) and *Alternatives Analysis Report* (***"Alternatives Analysis Report"***) both dated November 1, 2006, the North King Street and Dillingham Boulevard alignments remained as alternatives for the segment, but the remaining alignments were eliminated. See *Detailed Definition* at 6-16; *Alternatives Analysis Report* at 2-7.

The *Alternatives Analysis Report* ultimately decided that the Dillingham Boulevard alignment was optimal, and that the alignment was selected for discussion in the DEIS. See *Alternatives Analysis Report* at 6-4. One reason cited was that the Dillingham alignment would require acquisition of fewer residential parcels than the North King Street alignment. The table shows two residential parcels along the North King Street alignment that would be acquired compared to one along the Dillingham alignment. See id. Table 4-1, at 4-2. Unfortunately, neither the residential parcels nor the number of units on the parcels for each alignment is identified in the 2006 *Alternatives Analysis Report* to permit an evaluation of the number of residents who would be displaced under either alignment. However, Appendix B of the DEIS shows that all or portions of three residential parcels (not one as noted in the *Alternatives Analysis Report*) along Dillingham Boulevard are slated for acquisition by the City and the *Neighborhoods and Communities Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008d) dated August 15, 2008, at 5-17 states that along Dillingham "[p]roperty acquisitions would result in 11 residential displacements." Thus, further evaluation would seem to be warranted to determine impacts on residents along both alignments.

The *Alternatives Analysis* states that the North King Street alignment would serve more residents than the Dillingham alignment, but notes that it would serve fewer jobs. As a general matter, serving more residents could lead to an increased ridership of rail because the rail system would be closer to people's homes. Further, the North King alignment is a particularly attractive alternative if the City chooses not to make the stations along the Dillingham alignment more accessible by building parking garages near the stations.

The *Alternatives Analysis Report* also stated that a greater number of potentially historic properties are located along the North King Street alignment. See id. at 4-1. The number of historic properties located along each alignment is not quantified, and the definition of "historic properties" is unclear; it might be that certain properties are "old" but do not have social, cultural, or historic value.

It should also be noted that the Dillingham alignment will require acquisition of three times more the commercial/office parcels (22 parcels) than the North King Street alignment (6 parcels). See id. Building a rail line will exacerbate already difficult economic conditions for Dillingham businesses.

The *Alternatives Analysis Report* states that the Dillingham alignment would result in fewer noise impacts. See id. at 6-4. The basis for the conclusion is not available in the report yet should be for such an important consideration.

Finally, the State recently announced its plans for a "flyover," an elevated two-lane roadway over Nimitz Highway, which "would run from the Ke'ehi interchange to Pacific Street, zipping commuters through Kalihi with no way to get off until its end." Mary Vorsino, "Hawaii Set for Years of Roadwork in 'Huge' $4B Highway Plan – 6-year effort includes Nimitz 'flyover,' better bike access," *Honolulu Advertiser*, Feb. 4, 2009. The impacts of the two proposed elevated structures over the parallel traffic corridors of Nimitz Highway and Dillingham Boulevard should be considered in evaluating a North King alignment.

One of the primary reasons given for choosing the Dillingham alignment is that it is projected to experience the highest transit ridership, which includes ridership on various modes of transportation (*e.g.*, busses). See id. at 3-6, 6-4. However, according to data reported in the DEIS, the North King alignment is forecasted to make 128,500 daily trips on the *fixed guideway system* as opposed to 123,700 daily trips for the Dillingham alignment. See id. Thus, for purposes of comparing two fixed guideway alignments, the North King Street alignment actually would attract more use. Moreover, the North King Street alignment is forecasted to experience twice the number of daily boardings than the Dillingham

alignment—*i.e.*, 10,860 daily boardings for the three stations along the North King alignment[20] versus 5,370 daily boardings for the two stations along the Dillingham alignment.[21]

For these reasons, KS requests that the Final EIS include the North King Street alignment as an alternative.

IX. EVALUATION OF AN AT-GRADE OR MULTI-MODAL SYSTEM IN THE URBAN CORE

Comment #16: An at-grade or multi-modal transit system in the urban core is an alternative worth evaluating to determine whether it is a less expensive and quicker to construct than an elevated system.

KS is supportive of a fixed guideway transit system.[22] The fixed guideway alternatives discussed in the DEIS utilize an elevated rail system and vary only in terms of alignment. See DEIS at S-4. None of the alternatives discussed in the DEIS appears to utilize at-grade technology for any segment of the alignment. While it is understandable why an elevated system might be utilized in rural areas of the transportation corridor, as discussed elsewhere in this comment letter, a host of adverse economic and environmental impacts are associated with an elevated guideway system, including noise, reduced visibility and access to businesses, visual blight, and increased crime. Such impacts will be greatest in the urban core where businesses and commercial land holdings are concentrated, including those of KS. For these reasons, it makes sense to consider an alternative to an elevated system at least within the urban core. KS believes that an at-grade system running from the perimeter of the urban core is a viable alternative to an elevated system based on cost, visibility impacts, urban aesthetics, construction impacts, and time to construct.

It is KS' understanding that the City did not formally reject an at-grade system as an alternative during the alternatives analysis.[23] Because the issue of whether the rail system should run on an elevated line instead of at-grade was never squarely raised during the alternatives analysis process, KS did not previously have the opportunity to comment on the relative merits of an at-grade versus elevated system.

It does not appear that the at-grade alternatives were adequately studied before being eliminated from consideration in the DEIS. Although at-grade alternatives were considered during the alternatives screening process, the reasons why they were not carried through to the DEIS is not explained. In fact, the *Alternatives Screening Memo* left open the option of constructing certain portions of a fixed guideway system at-grade. See, e.g., Screening Memo at 4-1, 4-4. For example, at-grade options were contemplated for the portion of the route from Leeward Community College to Aloha Stadium and from Aloha Stadium to Ke'ehi Interchange (Section 4). See id. at 4-10 to 4-17. The *Detailed Definition* did not discuss whether the fixed guideway system would be elevated, at-grade, or below-grade.

The *Alternatives Analysis Report* is largely silent on whether the fixed guideway alternative would be at-grade or grade-separated (or a combination). The "optimum alternative" identified in the *Alternatives Analysis Report*, which apparently became the alternative endorsed in the DEIS, was compared to other alternatives differing in terms of method (*e.g.*, managed lane alternative, TSM alternative) and route, not above-grade versus at-grade. The only reference to an elevated fixed guideway in Chapter 6 is a statement that the Twenty-Mile Alignment "continues elevated following Nimitz Highway to Ala Moana Center." Id. at 6-5. Based on this chronology, it is KS' understanding that the discussion of what fixed guideway system is optimal for the urban core remains open. This is an opportune time to continue the discussions.

A ground-level transit system for the urban core is worth considering because it can meet performance demands, and it has been demonstrated to work in other cities. Los Angeles' Blue Line is an

example of a rail system that utilizes a combination of at-grade, elevated, and subterranean technology. In the urban core of Long Beach, however, the Blue Line is completely at-grade. Our research indicates that the system carries 56,000 passengers per day with 20 peak hour trains running during both morning and afternoon commutes and 10 off-peak trains.

Portland's Tri-Met system is an example of a mixed-grade system. The Portland Metropolitan Area Express ("***MAX***") Light Rail system is at-grade through downtown and runs on elevated lines to the suburbs. Other types of trains also service the downtown area.

A similar at-grade system would be a viable option for the urban core of Honolulu. KS' understanding is that the desired through-put of the Project in mixed traffic is 3-minute headways and 6,000 passengers per hour per direction ("***pphpd***"). Experts have noted that a light rail transit ("***LRT***") system running on surface streets could satisfy the criteria. Three-minute headways equate to 20 train movements per hour; thus, a capacity of 6,000 pphpd requires that each train carry 300 passengers per hour. Modern light rail vehicles ("***LRV***") have a capacity in the range of 232 passengers per car. When operated in two-car trains, LRVs can exceed the throughput requirement.

Examples of at-grade LRT systems that can achieve the specified through-put include the following:

Alberta, Canada. Calgary, Alberta's system provides more than 6,000 pphpd capacity on Seventh Avenue, a surface street having numerous cross streets controlled by traffic lights. Its current schedules show that Calgary Transit operates its C-Train Route 201 (Dalhousie/Bridlewell-Somerset) every 4 minutes during the weekday morning and afternoon peak periods; the C-Train Route 202 (McKnight-Westwinds/City Centre) runs along Seventh Avenue every 6 minutes during the weekday morning and afternoon peak periods. This results in a combined headway of 2 minutes, 24 seconds. With the delivery during 2007 and 2008 of 40 additional LRVs, both of the light rail lines are being operated with three trains of Siemens-built U-2 and S160 LRVs, each with a practical capacity of 162 passengers, resulting in a practical capacity along Seventh Avenue of 12,150 pphpd based on 75 LRV car movements per hour.

Portland, Oregon. Portland, Oregon's MAX is a three-line LRT that operates through its central business district in curbside lanes along Morrison and Yamhill Streets. The three LRT lines currently operate a combined 4-minute headway (15 trains per hour in each direction) through Pioneer Square, the center of Portland's central business district, during the weekday morning and afternoon peak hours. A fourth LRT line, which will run for 1.8 miles through the central business district along Fifth and Sixth Avenues and on a 6.5 miles-long branch to Clackamas Town Center is nearing completion and is scheduled to be placed into passenger-carrying service on September 10, 2009.

Denver, Colorado. Denver's Regional Transit District operates 15 LRT trains (4-minute average headways) with lengths varying between two and four cars on its D, F, and H lines along California and Stout Streets. The West Line, a third LRT now under construction, will add two additional services throughout downtown Denver.

The above examples show that an at-grade transit system for the Honolulu urban core is an option worth serious study and consideration.

Endnotes:

[1] KS is a landowner in Honolulu, and the proposed rail alignment traverses through four key communities in which KS has a combined land area of approximately 229 acres. In each community, the proposed rail line either bisects KS' land holdings or runs along the perimeter of its properties.

[2] See **Comment # 3** for a more specific discussion on parking impacts.

[3] This request is made pursuant to 40 C.F.R. §§ 1508.8 and 1508.14. "When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." 40 C.F.R. § 1508.14. The *Economics Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008c) issued by DTS on August 15, 2008 was also reviewed in formulating this comment.

[4] Mitigation measures for post-construction impacts are discussed in other sections of this letter.

[5] Note that the *Transportation Technical Report* was also reviewed in formulating this comment.

[6] Publication No. FHWA HI-88-054.

[7] Boulevard Saimin is identified as a historic property in the DEIS. See DEIS at Table 5-2, page 5-7.

[8] The DEIS provides, "Acquisition of property for the Build Alternative would be conducted in accordance with Federal and State regulations and procedures outline in the Real Estate Acquisition Management Plan (RTD 2008q). Where relocations would occur, affected property owners, businesses, or residents would receive compensation in compliance with all applicable Federal and State laws. Compensation would be in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act (CFR 1989)." DEIS at S-6.

[9] By way of example, although there are references to increasing the width of Dillingham Boulevard by ten feet, it is unclear whether each right-of-way taking along Dillingham Boulevard will be ten feet wide.

[10] The maps included in Appendix B of the DEIS indicate that the rights of way acquisitions "may be in the form of an aerial easement; an easement allowing joint use; subdivision of property with transfer of title; transfer of title for the entire parcel; or some other form to be documented by Land Court registration."

[11] By way of example, it would make sense to treat the parcels constituting Dillingham Shopping Plaza as a single parcel because they are owned and operated as an integrated economic unit.

[12] Defined consequences would also ensure that the City understands that the federal requirements are not merely guidelines (notwithstanding the label of "policies" or "plan"), but are enforceable obligations to be taken seriously with consequences for failure to comply.

[13] For example, if the City condemns a strip of land in the middle of a parcel, the City's condemnation could create two nonconforming (substandard) parcels. The City has not allowed the consolidation of the nonconforming parcels with adjoining parcels owned by the same party. Such nonconforming (substandard) parcels adversely impact the property owner's ability to develop, sell, or lease such parcels.

[14] If the City does intend to use its power to take private property for private development, including any TOD or TSD, it is requested that the Final EIS (a) describe in detail any such intended use of the City's eminent domain power, (b) evaluate and disclose the economic and social impacts of such action, and (c) propose mitigation measures.

[15] The DEIS contains Table 4-35, at 4-169, entitled "Rail System Benefits on Real Estate Values." This summary appears to be incomplete and could be misunderstood as showing how the Project will increase "home" values if the home is located closer to the rail line.

[16] By way of example, a 1996 study of properties within a half mile of Portland's MAX stations had higher values but those within a half mile of the rail line, but not near a station, decreased in value. A 2004 study even showed that home values near the Chicago Midway Line station decreased in value after the rail project was completed.

[17] A study has shown that adjacency to transit stations is not a sufficient factor to cause development to occur. It found dozens of stations areas where no new development had occurred for 20 to 30 years. It is reported that along LA's Metro Blue Line, there has been little or no development activity along a several mile stretch of Long Beach Boulevard. Real estate professionals indicated that "the location of the transit line in the middle of the street had a significant negative impact on accessibility to retail businesses along the street.

[18] Development along the rail line will not likely occur automatically; governmental assistance and coordination are needed. It is reported that Portland TODs are heavily subsidized in the form of tax breaks, infrastructure subsidies, below-market land sales, and direct grants. The City of Portland has used tax incentives ($100 million of 10-year waivers of property taxes offered to high-density residences along the light-rail line) to help overcome redevelopment hurdles. This is excluding the $1.2 billion in tax-increment financing that Portland is offering to developers along the rail lines or similar direct subsidies offered by Portland's suburbs, including Gresham and Beaverton.

[19] It is important that KS, prospective investors, lenders, and affected businesses be given an opportunity to provide input on the bills. It should be noted that, the *Land Use Technical Report* provides that Kapalama has a "low potential for TOD," Table 5-1, at 5-4. KS requests further discussions with the City on the potential for TOD in Kapalama.

[20] This is the sum of the forecasted 3,530 boardings at the North King & Owen Street station; 2,580 boardings at the North King Street & Waiakamilo Road station; and 4,750 boardings at the North King Street at Liliha Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

[21] This is the sum of the forecasted 3,030 boardings at the Dillingham Boulevard & Mokauea Street station and 2,340 boardings at the Dillingham Boulevard & Kokea Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

[22] The term "fixed guideway" means:

> (4) Fixed guideway.--The term "fixed guideway" means a public transportation facility—
>
> (A) using and occupying a separate right-of-way or rail for the exclusive use of public transportation and other high occupancy vehicles; or
>
> (B) using a fixed catenary system and a right-of-way usable by other forms of transportation.

49 U.S.C. § 5302(a)(4). This definition does not distinguish between elevated and at-grade systems. Furthermore, according to the *Alternatives Analysis Report* at 5-5, the FTA Section 5309 New Starts program provides funds for the construction of a "new fixed guideway" system, which "refers to any transit facility that uses exclusive or controlled rights-of-way or rails, entirely or in part. Eligible purposes for these funds include light rail line, rapid rail (heavy rail), commuter rail, automated fixed guideway system (such as a 'people mover'), a busway/HOV facility, or an extension of any of these." Id.

[23] If the City did make a formal determination that an at-grade system is inferior to an elevated system and thus rejected an at-grade system as a viable alternative, information on that determination should be provided.

TERM	DEFINITION
Alternatives Analysis Report	*Alternatives Analysis Report* dated November 1, 2006
Alternatives Screening Memo	*Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project* dated October 24, 2006, prepared by Parsons Brinckerhoff
BDMP	Business Disruption Mitigation Plan
CBRE	CBRE Consulting, Inc.
City	City and County of Honolulu
DEIS	*Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation* dated November 2008
Detailed Definition	*Alternatives Analysis Detailed Definition of Alternatives Honolulu High-Capacity Transit Corridor Project* dated November 1, 2006, prepared by Parsons Brinckerhoff
DTS	Department of Transportation Services of the City and County of Honolulu
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
Final EIS	The Final EIS for the Honolulu High-Capacity Transit Corridor Project
FTA	Federal Transit Administration
HEPA	Hawai'i Environmental Policy Act, Hawai'i Revised Statutes, Chapter 343
KS	Kamehameha Schools
Land Use Technical Report	*Land Use Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008b) dated August 15, 2008
LRT	Light rail transit
LRV	Light rail vehicle
MAX	Metropolitan Area Express
MOT Plan	Maintenance of Traffic Plan
NEPA	National Environmental Policy Act, 42 U.S.C. § 4321 *et seq.*
Pphpd	Passengers per hour per day
Project	Honolulu High-Capacity Transit Corridor Project
RAMP	*Real Estate Acquisition Management Plan (RAMP) Honolulu High-Capacity Transit Corridor Project* (RTD 2008q) dated February 29, 2008 and revised on April 1, 2008
RTD	Rapid Transit Division of the Department of Transportation Services of the City and County of Honolulu
TMP	Transit Mitigation Plan
TOD	Transit-oriented development
Transportation Technical Report	*Transportation Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008a) dated August 15, 2008
TSD	Transit-supportive development
UltraSystems	UltraSystems Environmental
Visual and Aesthetics Resources Technical Report	*Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project* (2008e) dated August 15, 2008

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June 11, 2010

RT2/09-299125R

Mr. Kirk Belsby
Kamehameha Schools
567 South King Street
Honolulu, Hawaii 96813-3036

Dear Mr. Belsby:

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

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

I. Effects of Construction on Business

A. Physical Effects

Response to Comment #1 regarding construction effects on businesses

1. *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. Access to businesses near construction activities could be temporarily affected but will be maintained. In several locations, left-*

turn lanes will be closed during construction, some streets may be made temporarily one-way or have parking eliminated during construction.

2. *The City will mitigate temporary impacts associated with construction. To reduce adverse economic hardships for existing businesses along the project alignment during construction the City will coordinate construction planning and phasing with nearby property owners and businesses; initiate public information campaigns, including signs and lighting, to reassure people that businesses are open during construction and to encourage their continued patronage; minimize the extent and number of businesses, jobs, and access affected during construction; to the extent practicable, coordinate the timing of temporary facility closures to minimize impacts to business activities—especially those related to seasonal or high sales periods; minimize, as practical, the duration of modified or lost access to businesses; phase 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; and provide advance notice if utilities will be disrupted and scheduling major utility shutoffs during non-business hour.*

   Properties that are anticipated to be acquired by the Project, including businesses, are identified in Appendix C: Preliminary Right-of-Way Plans of this Final EIS.

   As discussed in Sections 4.18.1 and 4.18.2, the City will coordinate with property owners regarding both temporary impacts during construction and long term impacts. The City will notify and coordinate with adjacent property owners adjacent to the Project that will be temporarily impacted during construction and when the Project will require acquisition of property. Coordination will be on-going during both design and construction.

3. *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, Section 4.18.1.*

   a. *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 Section 4.18.1 states, "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" and "minimize, as practical, the duration of modified or lost access to businesses." As part of the City's coordination with businesses, advanced notice will be provided if utilities will be disrupted and shut-offs will be scheduled during non-business hours. Many of the other suggested elements in your letter will be incorporated into the construction contract documents as performance specifications or as design criteria that will be used by designers and contactors. 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.

b. *Sections 3.5.7, 4.18.1, and 8.7 of the Final EIS discuss public involvement activities that will occur during construction. For instance, Section 4.18.1 states that public involvement activities will include signage and lighting to reassure people that businesses are open during construction.*
c. *As discussed in Section 4.18 of the Final EIS the City will coordinate with affected residents and businesses prior to construction. A public involvement plan will be developed prior to each construction phase that will detail outreach tailored to the construction phase. The City will maintain the Project website (www.honolulutransit. org) and telephone hotline, which will also provide information to the community regarding construction phasing.*
d. *The Final EIS discusses several approaches that will be taken to inform the public about construction activities. Section 8.7 of the Final EIS states that "the City will continue the use of the Speakers Bureau, the project website (www.honolulutransit.org), and a telephone hotline to inform the public about construction activities. Section 3.5.7 states that newsletters, local newspapers, radio and/or television spots, news releases, instant messaging lists, and fliers may also be used to provide information to the public. The hotline will provide the means for members of the public to talk to those working on the Project and ensure their specific questions are addressed. Lighting and signage will be used to reassure the public that businesses are open during construction. Signage will also be used to direct pedestrians and bicyclists to the safest and most efficient route through construction zones (Section 3.5.7) and to direct motorists of parking disruptions and alternatives.*
e. *Some elements suggested for the Business Disruption Mitigation Plan, 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 Effects

Response to Comment #2 regarding economic effects and mitigation

1. *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 activities 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.*

As discussed in Section 4.18 of the Final EIS, the City will mitigate these temporary effects to protect residents' and businesses' 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.

The City will employ the following measures during construction:

- *Maintain access to businesses during construction.*
- *Develop a public involvement plan prior to construction to inform business owners of the construction schedule and activities.*
- *Initiate public information campaigns to reassure people that businesses are open during construction and to encourage their continued patronage.*
- *Minimize the extent and number of businesses, jobs, and access affected during construction.*
- *Coordinate 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.*
- *Minimize the duration of modified or lost access to businesses—as practicable.*
- *Provide signage, lighting, or other information to indicate that businesses are open.*
- *Phase 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.*
- *Provide advance notice if utilities will be disrupted.*
- *Schedule major utility shut-offs during non-business hours.*

As discussed in Section 4.3.2 of the Final EIS, the Project will require the acquisition of some commercial and industrial properties. This will displace the businesses using the properties as well as their employees. However, it is anticipated that these businesses will be relocated to new sites. Once constructed, the Project will employ workers for maintenance and operation of the system. It is anticipated that workers will be hired from the existing local labor force and trained to meet job requirements. The number of new workers will be small compared to the total labor force on Oahu and is included in the operating and maintenance costs for the Project. Workforce costs are included in the operating and maintenance cost estimates discussed in Section 6.4.1. The Project is not expected to result in long-term adverse effects on the economy or property tax revenues. No mitigation measures will be needed.

2. *No independent evaluation study is planned.*

3. *The City will not provide direct financial assistance to mitigate temporary impacts during construction to businesses. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

II. Potential Parking Effects of Completed System

A. Potential Parking Effects

Response to Comment #3 regarding parking

The comment involves three types of potential parking-related effects: lost on-street parking, spillover parking in station areas (referred to as "illegal parking" in original letter), and lost off-street parking, which may affect redevelopment. 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.

Regarding the loss of on-street parking, a survey of parking usage conducted in June 2008, April 2009, and March 2010 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 approximate locations of lost spaces as the streets are rebuilt after construction. New parking spaces could be short-term, long-term, or loading zones, depending on the need, as determined by the City.

Analysis conducted for the Project also examined potential effects from spillover parking. One possible effect of spillover parking would be an increase in demand for existing parking spaces near stations. As stated in Section 3.4.7 of Final EIS, the City will conduct a before-and-after parking study that will identify impacts of spillover parking both on-street and off-street, and will implement one or more of the following mitigation strategies as needed:

- *Parking restrictions;*
- *Parking regulation;*
- *Permit parking; and/or*
- *Shared parking arrangements.*

Follow-up surveys will be conducted by the City to determine if the mitigation strategy(ies) is effective, and additional measures will be implemented by the City as needed. Regarding transit riders parking illegally in private retail and business parking areas, that issue will also be included in the City's parking study and will be covered by one or more of the strategies listed above. Additionally, analysis was completed to determine if spillover parking will affect traffic and parking supply near stations. The traffic analysis was conducted for the a.m. and p.m. peak hours. The intersection level-of-service analysis determined that additional traffic from spillover parking will not affect local traffic conditions. Please see Addendum 02 to the Transportation Technical Report (RTD 2009i) for more detail.

The City will provide parking facilities at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium). These stations were selected based on results from the travel demand forecasting model which showed these stations had high drive to transit demand. The City has identified the land that will be acquired for the Project as part of the right-of-way needed along the length of the corridor, including the land needed for the four park and ride facilities. Compensation will be in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City does not anticipate acquiring any additional land for parking near any of the other stations. Additionally, regarding the limited supply of parking near stations affecting property owners' potential redevelopment plans, the City will develop parking regulations and strategies over time that respond to the specific needs of each station area.

The following text is in response to sub-comments 1-6 within Comment #3 of your letter:

1. *Parking needs at each transit station has been added to the Final EIS as Table 3-22.*

2. *Table 3-22 in the Final EIS shows an estimated demand of five parking spaces at the Kapalama Station. Rather than providing five parking spaces, the City intends to provide bus service, bicycle parking and improved sidewalks to encourage riders to access this station by modes other than the private automobile. The spillover parking surveys mentioned previously will assess spillover demand once the stations are opened and parking mitigation would be implemented as needed.*

3. *Along Dillingham Boulevard near Honolulu Community College, the City will purchase right-of-way to preserve the existing number of through- and turn-lanes. As shown in Table 3-24 of the Final EIS, this acquisition will result in the removal of approximately 30 off-street parking spaces that will be purchased in*

accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project; however, the Project will help reduce the need for such parking. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

4. *Regarding the loss of on-street parking on Halekauwila Street, as stated in Final EIS section 3.4.4, a parking usage survey was conducted in April 2009 along Halekauwila Street. This survey examined current usage of on-street parking in this location. The results of this study, which are summarized in Table 3-24 of the Final EIS, revealed that most on-street spaces between Punchbowl Street and Cooke Street were lightly to moderately used during the week day (approximately 25 to 75 percent of spaces were full) while over 75 percent of spaces were full between Cooke Street and Kamani Street.. This survey also found that alternative parking was generally available within one block of the parking spaces to be removed, and as a result, it is not expected that transit riders would park in the commercial parking lots in this area. As a result, these on-street spaces will generally not be replaced.*

5. *Regarding the loss of off-street parking along Dillingham Boulevard, as stated in Section 3.4.7 of the Final EIS, properties related to effected private, off-street 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 of 1970. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project; however as stated above, the Project will help reduce the need for such parking. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

6. *The project design has been revised since the Draft EIS and as a result, there will not be a loss of parking on Halekauwila Street between Keawe Street and Coral Street.*

B. Mitigation Measures for Parking

Response to Comment #4 regarding parking mitigation

1. *Based on comments received on the Draft EIS, additional parking surveys have been conducted since the Draft EIS was released. As stated in the response to*

Comment #3 (above), these parking surveys revealed that there is parking available within one block of the parking spaces to be removed. As a result, on-street parking spaces will generally not be replaced. The City is committed to conducting spillover parking surveys before construction of the station and again after the station is opened. Results of the surveys will be used to determine the appropriate mitigation strategies.

2. *The Final EIS includes a table showing mode of access (walk/bike, bus, kiss-and-ride, and parking) to each transit station (Table 3-20). Additionally, Table 3-22 in the Final EIS shows parking demand at each station. Table 3-20 shows that 90 percent of transit riders will access fixed guideway stations by walking, biking, and the bus. Parking demand is expected to be minimal overall. Spillover parking surveys will be conducted at each station before construction begins and again after the station is opened to determine actual spillover effects. As stated in Chapter 3, Section 3.4.4, the actual extent of spillover parking near stations will be influenced by a variety of factors, including changing conditions between now and the time the station is opened as well as future development. As a result, parking surveys conducted before and after station opening is the most appropriate way to gauge actual effects directly attributable to the station.*

3. *The travel demand forecasting model identified stations with high drive to transit access. Park and ride facilities are being built at four stations (East Kapolei, UH West Oahu, Pearl Highlands, and Aloha Stadium) based on these modeling results. The City does not plan to construct any parking facilities at the other fixed guideway stations.*

4. *Thank you for your suggestion regarding public assistance toward building parking structures. The City recognizes that good parking management is important to the success of the Project and to station areas in particular. As part of the Project, the City will provide a total of 4,100 parking spaces at four stations, including structured parking for 1,600 cars at the Pearl Highlands station. In addition, as part of a different project, the City is planning to build a 1,000 space parking garage near the Middle Street Transit Center station. At this time, the City does not plan to participate in the construction of other parking structures near stations.*

5. *Regarding your suggestion for a signage and parking permit program, the City understands that providing proper signage and real-time information is crucial for the construction phase and during operation of the system. As stated in Section 3.5.7 of the Final EIS, where existing parking is disrupted by construction, signs will be posted directing people to nearby locations with available parking. The public will be kept aware of upcoming work locations and information will be available on the project website about parking disruptions and alternatives. The City will coordinate with property and business owners regarding the timing of construction and other issues to minimize disruptions to off-street parking. A permit parking program will be considered among other strategies by the City to mitigate the effects of spillover parking near transit stations.*

III. Effects of Completed System on Businesses along Rail line and at Transit Stations

A. Physical Effects

1. Traffic, Visibility, and Access to Businesses

Response to Comment #5 regarding visibility and access to businesses

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 in this area, as noted in Table 4-9, will be moderate.

More detail on the consideration of viewer response in 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 drop-offs, 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 3.4.7 of the Final EIS. As stated in response to Comment #3 (above) parking is generally available within one block of the parking spaces that will be lost due to construction of the Project. As a result, the City does not generally plan to replace lost on-street parking.

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 comply with 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 along all roadways, including those roadways referenced in your comment, 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

The City commits to the following measures to mitigate effects from the Project:

(a) With regard to parking-related mitigation, as noted in Section 3.4.7 of the Final EIS, station areas with the highest estimated demands for spillover parking are at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Spillover parking surveys will be conducted around each station before and after construction to determine any effects from spillover parking and mitigate as appropriate. Mitigation could range from parking restrictions or regulation, permit parking or shared

parking, or other measures as noted in Section 3.4.7 of the Final EIS. 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.

(b) *With regard to access to and from businesses, 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 Section 4.18.1 states, "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" and "minimize, as practical, the duration of modified or lost access to businesses."*

(c) *With regard to traffic circulation, Section 3.4.7 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.*

(d) *As stated previously, lane widths along all roadways will meet AASHTO and the HDOT standards. As a result, it is not anticipated that there will be an increase in traffic accidents. Further, as stated in Section 3.6.1, the Project will result in a reduction in vehicle miles traveled, which could reduce traffic accidents. Additionally, as stated in Section 2.5.4 of the Final EIS, operation in exclusive right-of-way eliminates the potential for accidents between automobiles and fixed-guideway transit vehicles. Because pedestrians will not be allowed to cross the tracks, the potential for pedestrian accidents is virtually eliminated.*

(e) *The Project will be elevated over roadway. For motorists, passengers and pedestrians traveling on the roadways where the guideway will be overhead, views of businesses will not be affected.*

Regarding your suggestions for traffic signals and elongated turning lanes mentioned under part d. mitigation, as detailed in Section 3.4.7 of the Final EIS, mitigation measures at the six intersections effected by the Project include widening of intersections to provide turn lanes and installing of new traffic signals and coordinating these signals with adjacent signals. Additionally, the City will restripe the section of H-2 Freeway near Kamehameha Highway to provide a parallel merge lane. Addendum 2 provides information on the additional traffic studies that have been conducted for the Project.

2. Noise and Vibration

Response to Comment #6 regarding noise and vibrations

The Project's noise analysis was prepared in accordance with FTA's Transit Noise and Vibration Impact Assessment Manual (2006). The analysis accounts for additional nighttime noise sensitivity by evaluating Ldn noise levels, which include a penalty for noise generated at night. Noise impacts to noise sensitive uses, including commercial areas, were evaluated according to FTA policy. 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 that has been committed to in the Final EIS (wheel skirts and use of sound absorptive materials), there are no noise impacts 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

Response to Comment #7 regarding security

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 by police, transit staff, and/or private security and will be closed at night when the system is not in operation (between midnight and 4:00 a.m.). Additionally, as stated in Section 2.5.4, of the Final EIS, security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center will also be included at all stations, park-and-ride facilities, and vehicles. The system will also 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. As discussed

in this section, security measures will include Crime Prevention through Environmental Design (CPTED) 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. CPTED measures ensures that spaces are visible, open, well-lit and observable to minimize crime and will be incorporated at all stations. The City will provide maintenance to the guideway and transit facilities.

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 Effects

Response to Comment #8 regarding visual and aesthetic effects

The following comments are in response to Comment #8 in your letter, Letters A-D.

Throughout the Draft EIS review and comment period, many commented that visual changes associated with the project's elements will result in substantial visual effects. Many comments received expressed concern that the elevated fixed guideway transit system will adversely affect Oahu's unique visual character by creating blight and degrading views. In addition, commenters, including Kamehameha Schools, requested more information on how the project elements will be integrated with their communities, especially in the areas around stations.

These comments on view effects are representative of the various viewer groups (including businesses) that have been considered in the visual and aesthetic conditions analysis presented in the Draft EIS and the Final EIS. The definition and description of viewer groups is provided in Section 3.1.4 of the Honolulu High-capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008). The following is an explanation of the terms "viewer exposure" and "sensitivity." Viewer exposure refers to the view groups' physical location, the relative number of people exposed to the view, and the duration of their view. This includes transit and highway users and people in the surrounding area. Viewer sensitivity refers to a group's expectations relative to a particular visual setting in a particular area. It is also the extent to which visual elements are important to the viewer group. Viewer sensitivity is affected by a variety of factors, including the activities a viewer in engaged in; the visual context; and their values, expectations, and interests. The assessment of visual

effects in Section 4.8 of the Final EIS has considered that each viewer group, including business owners, customers, and employees, are important (see "Viewer Groups," in Section 4.8.2 of the Final EIS). The methodology for the visual assessment is detailed in Section 4.8.1 of the Final EIS. In addition, each viewer group's characteristics were considered in the assessment of visual effects for each of the viewpoints described in Table 4-9 in Section 4.8 of the Final EIS. The effects, which are noted as low, moderate, or significant, also consider each viewer group's location, duration, and distance.

In response to the viewer groups' responses, received during the Draft EIS comment period, several key views have been reevaluated and the Final EIS has been refined (see section 4.8 of the Final EIS). The overall conclusions of the Draft EIS have not changed. The analysis of protected views and vistas was provided in earlier technical documents; however, the Final EIS more clearly describes the visual effects on these resources.

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 Final EIS acknowledges that the Project will have shadow, light, and glare effects Mitigation is listed in 4.8.3. Effects on property values are discussed in Section 4.19.2 of the Final EIS. Property values in the vicinity of rail systems tend to increase, including in the vicinity of rapid rail systems with elevated sections (see Table 4-38 and Section 4.19.2 of Final EIS).

As discussed in Section 4.8.2 of the Final EIS major viewer groups within the project corridor include residents, commuters, business owners, recreationists, and visitors. Residents are people who observe the visual environment daily and for extended periods. Commuters are those who frequently travel through an area and, therefore, are familiar with the existing visual environment. However, this group may not have the same sense of ownership as residential viewer groups because they do not reside within that environment but only pass through it. Business owners have a vested interest in the visual environment surrounding their operations. Most business owners are familiar with their surrounding environment and may have a sense of ownership. Recreationists include people who frequent local parks, hiking trails, bikeways, and watercourses. They have definite expectations about the visual environment's condition. Visitors consist of both first-time and repeat visitors to the area. Visitors may consist of tourists, delivery or service personnel, or business employees and customers. This viewer group is less familiar with the existing visual environment's specific details, but they tend to have some sensitivity to and expectation of the surrounding environment. DPP and other interested groups (e.g. the Outdoor Circle, Scenic Hawaii Inc., the Honolulu Chapter of the American Institute of Architects) also provided data or input regarding the visual impact assessment for the Project. The major components of the visual impact assessment are described in 4.8.1 of the Final EIS. The U.S.

Department of Transportation methodology does not prescribe the development of 360-degree visuals for multiple cross sections of the rail line. The methodology as described in the Final EIS provides the information required to determine visual impact of the Project.

The Honolulu High-Capacity Transit Corridor Project Visual and Aesthetics Resources Technical Report discusses the methodology for the visual impact assessment. This assessment includes views from representative viewpoints. Selection of these viewpoints was limited to readily accessible public areas such as parks, sidewalks, streets, and parking lots. A greater emphasis was placed on identifying views toward the Project, because this best represents most viewers and the greater variety of views that would be experienced.

The visual simulations are intended to accurately represent the structure's scale in relation to other objects. However, they do not reproduce the entire field of view that individuals would perceive. Photographs typically produce a static field of view, but an individual's eyes constantly scan and selectively focus on a scene for content. As a result, photographs often do not show scenic features as prominently as they might appear to individual observers.

The visual simulations are intended to represent the scale and spatial relationships of project elements to other objects. Some of the simulations are also intended to represent view corridors identified as protected resources in pertinent policy documents. These simulations serve several purposes: they were used to evaluate visual and aesthetic consequences, demonstrate the potential for mitigation, and provide a means of communicating the findings of the analysis.

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.

The assessment of visual effect from the Project as described in Section 4.8.3 of the Final EIS considers the existing development along the project alignment. Within the Project corridor the environment changes from rural in the Waianae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, DTS has developed specifications and design criteria to address the City's requirements for the Project that will be implemented as mitigation measures to minimize visual effects. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the

guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and DPP. The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by stations.

The following mitigation framework will be included with the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *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.*

Utility relocations are discussed in Section 4.5.3 of the Final EIS. The Project will relocate utilities where required, and the City will coordinate with adjacent property owners and utility companies prior to relocation and during relocation. Utility relocations will be designed to be compatible with the community setting as feasible. Details about utility relocations are discussed in Section 4.18.2 of the Final EIS.

B. Economic Effects

1. Business Effects

Response to Comment # 9 regarding economic effects on businesses

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 DPP 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 regarding redevelopment options

To accomplish the economic development objectives for Oahu's urban corridor, suitable infrastructure must be developed as described in Section 4.3 of the Final EIS. The Project is supportive of the land use and transportation elements of plans, policies, and controls within the study corridor as documented in Appendix J of the Final EIS.

Section 4.5.3 of the Final EIS discusses the potential new development and redevelopment along the project alignment, as well as the scale of the transit system itself, may affect the character of development along the alignment. \This section includes a discussion of the Project's effects on individual neighborhoods along the corridor.

IV. Cost and Financial Analysis

Response to Comment #11 regarding financial feasibility

a. *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.*

b. *Section 6.6 discusses the risks and uncertainties associated with the financial analysis prepared for the Project, including risks related to changes in project scope. If the Project is over budget, other sources of revenue have been identified in 6.3.3 and 6.6.3 and could include private funds (i.e., contributions toward the cost of building stations) or airport funds; however, $1.3 billion in year-of-expenditure dollars is included in the project budget as contingency for just such eventualities.*

c. *The State's announcement of a series of projects for construction as a result of a Federal stimulus program are already included in the No Build Alternative and are shown in Table 2-4 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.*

d. *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. Additionally, $1.3 billion in year-of-expenditure dollars is included in the project budget as contingency in the event of cost overruns.*

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 ensure the Project continues to be financially feasible and to avoid the types of problems encountered on other projects.

V. Effects of Land Acquisitions

Response to Comment #12 regarding land acquisition and mitigation

1. Individual assessments will be performed by the Project's Right-of-Way Team as the design progresses. Right-of-way plans are shown in Appendix C of the Final EIS. These maps show full and partial acquisitions and individual properties can be identified by tax map parcel numbers. As discussed in Section 4.4.3 of the Final EIS, where relocations will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (49 CFR 24). The following measures will be implemented for relocations:

- *The City will assist all affected persons in locating suitable replacement housing and business sites within an individual's or business's financial means. A minimum 90 day written notice will be provided before any business or resident will be required to move.*

- *Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably.*

- *Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

2. All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City will work with land owners if non-conformities occur as a result of acquisitions.

(3. Please note, there is no #3 comment in your original letter).

4. All acquisitions will follow the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The City will work with land owners if non-conformities occur as a result of acquisitions

5. 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.

6 – 8. The City recognizes property owner's specific needs and will have a Right-of-Way Team dedicated to this Project. Specific details will be worked out with individual property owners.

VI. Kelo Concerns

Response to Comment # 13 regarding private property

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 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. 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 200 full and partial acquisitions, mostly strip acquisitions along roadways (Section 4.4.3 of the Final EIS). All acquisitions and relocations will comply with the Federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act.

VII. TODs As Potential Mitigation

Response to Comment #14 regarding TOD

The following paragraphs are in response to Comment #14, Letters A, B1 and B2A-C in your comment letter.

a. The City has adopted plans that direct future development to occur within the study corridor and away from less developed portions of Oahu. The TOD policy will focus the growth into patterns that will increase the viability of a number of travel options available to corridor residents and employees, including transit, walking, and bicycling. TOD special districts will restrict development in agricultural and open-space areas and encourage mixed-use, high-density, walkable communities around transit stations. The special districts also encourage public input into the design of TOD neighborhood plans to reflect unique community identities. TOD planning is underway and will occur before the fixed guideway stations are constructed. The City passed this TOD ordinance in March 2009 in anticipation of the Project. Development in the study corridor, whether highway-oriented or TOD, will be based on market demands. Pursuant to the policy, TOD may occur in project station areas as an indirect effect of the

Project. The increased mobility and accessibility that the Project will provide may also increase the desirability and value of land near the stations, attracting new real estate investment nearby. See Section 4.19.2 of the Final EIS for additional information regarding TOD development.

b. The NEPA and Hawai'i Revised Statutes Chapter 343 require the evaluation of potential effects of proposed government actions on the environment. 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 Section 4.19 to reflect Ordinance 09-4. Evaluation of TOD projects in other cities with new rail projects is beyond the scope of this EIS.

c. DPP is working with the community to develop TOD plans. DTS, the lead agency for the Project, is not responsible for planning. However, the Project is supportive of this planning effort.

VIII. Study of the North King Street Alignment

Response to Comment #15 regarding a North King Street alignment

The North King Street alignment was evaluated in the Alternatives Analysis (November 2006). 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. While the North King Street alignment would serve more residents, Table 3-3 in the Alternatives Analysis Report shows that the fixed guideway route via North King Street had fewer overall riders than the route along Dillingham Boulevard. As a result of these reasons, the North King Street alignment was rejected as an alternative and thus not studied as part of the EIS. 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. The Nimitz flyover project was included in the modeling conducted for both the No Build and Build Alternatives studied in the Alternatives Analysis and EIS.

IX. Evaluation of An At-Grade or Multi-Modal System in the Urban Core

Response to Comment #16 regarding an at-grade or multimodal transit 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. These alternatives were rejected because they did not meet the Purpose and Need of the Project. The text below explains further reasons why an at-grade system was rejected.

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 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 (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 could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, 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 approximately $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). 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 (see bullets below). 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 (or less) blocks 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 operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute*

headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project 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 reach 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), and potential conflicts with other at-grade activity, including 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:*** *The Project will run with three minute headways. However, three-minute headways on an at-grade rail system would prevent effective coordination of traffic signals in the delicately balanced signal network in Downtown Honolulu. A three minute 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 rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. 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 with elevated rail, and in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing travel lanes, while providing a 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.*

  An at-grade light rail system with continuous tracks in-street, would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential 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 pedestrians 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 high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is 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 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 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.*

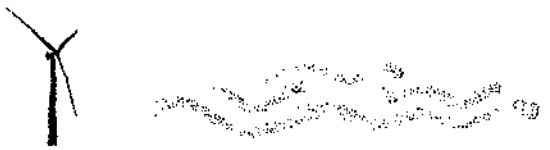
Because it is not feasible for an at-grade system through Downtown to move passengers rapidly and reliably without significant detrimental effects on other transportation system elements (e.g., the highway and pedestrian systems, safety, reliability, etc.), an at-grade system would have a negative system-wide 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. As a result of these reasons, an at-grade system was not evaluated as part of the Draft or Final EISs.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure



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re: Honolulu High-Capacity Transit Corridor Project (DEIS)

Submitted pursuant to 49 USC 1610 et. seq., 16 USC 470(f), 49 USC 303, 42 USC 4332(2)(c), 23 CFR 771, and Hawaii Revised Statutes Chapter 343

Life of the Land is Hawai'i's own energy, environmental and community action group advocating for the people and 'aina for almost four decades. Our mission is to preserve and protect the life of the land through sound energy and land use policies and to promote open government through research, education, advocacy and, when necessary, litigation.

This document is a joint NEPA and Hawai'i Revised Statutes Chapter 343 Draft EIS. (Preface ii)

'The Council on Environmental Quality, as part of its oversight of

implementation of the National Environmental Policy Act, held meetings in the ten Federal regions with Federal, State, and local officials to discuss administration of the implementing regulations. The forty most asked questions were compiled in a memorandum to agencies for the information of relevant officials. In order efficiently to respond to public inquiries this memorandum is reprinted in this issue of the Federal Register.
http://www.nepa.gov/nepa/regs/40/40p1.htm

In response to the many requests from the agencies and other participants, CEQ has compiled forty of the most important or most frequently asked questions and their answers and reduced them to writing. The answers were prepared by the General Counsel of CEQ in consultation with the Office of Federal Activities of EPA. These answers, of course, do not impose any additional requirements beyond those of the NEPA regulations. This document does not represent new guidance under the NEPA regulations, but rather makes generally available to concerned agencies and private individuals the answers which CEQ has already given at the 1980 regional meetings. (www.nepa.gov/nepa/regs/40/40p2.htm)

NEPA's Forty Most Asked Questions (www.nepa.gov/nepa/regs/40/40p3.htm)

2a. Alternatives Outside the Capability of Applicant or Jurisdiction of Agency. If an EIS is prepared in connection with an application for a permit or other federal approval, must the EIS rigorously analyze and discuss alternatives that are outside the capability of the applicant or can it be limited to reasonable alternatives that can be carried out by the applicant?

A. Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

2b. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized?

A. An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. Section 1500.1(a).

1. Is it reasonable to consider an at-grade (ground-level) rail system? Please elaborate.

2. Please list each document and the number of pages in each of those documents that considered an at-grade (ground-level) rail system.

3. Is it reasonable to consider an enhanced express bus system? Please elaborate.

4. Please list each document and the number of pages in each of those documents that considered an enhanced express bus system

5. What rail segments did you consider at the ground level? Please discuss each segment and why it was rejected.

6. Why were specific ground level rail segments were rejected and why? Please discuss each segment and why it was rejected.

7. What is the relative cost for ground-based and elevated rail for each segment?

8. Is there sufficient space along Farrington Highway for a ground-based track system?

9. Is there sufficient space along the H-1 in the Kapolei-Ewa area for a ground-based track system?

10. What would be impact of using an existing lane of Farrington Highway for a rail line?

11. Did you consider an above-ground line in Kapolei-Ewa becoming at-grade in the greater Waipahu area? Please elaborate.

12. Would it be better to have the train go directly to Leeward Community College or should the college be fed by a spur track?

13. How many additional riders would take the train if it stopped at Leeward Community College? Please elaborate.

14. Would it be better to have the train go directly to Waipio and Mililani or should Central Oahu have a spur track? Please elaborate.

How would a separate line, or a spur line, from Central O'ahu to this proposed line impact ridership:

15. How many additional riders would take the train if it stopped at Waipio?

16. How many additional riders would take the train if it stopped at Mililani?

17. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for at least one rail track?

18. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for

at least one rail track? two tracks?

19. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?

20. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?

21. Should there be a spur route into Pearl Harbor? Please elaborate re ridership.

22. How many additional riders would take the train if there were a spur rail line into Pearl Harbor Naval Station? Please elaborate re ridership.

23. Should there be a spur route into Hickam Air Force Base?

24. How many additional riders would take the train if there were a spur rail line into Hickam Air Force Base? Please elaborate re ridership.

25. Should the rail line go into Honolulu International Airport? Please elaborate re ridership. How would security be affected with a rail line displacing vehicle flows into the airport? What reductions in idling time by vehicles would be anticipated?

26. Should there be a rail loop at Honolulu International Airport, which could act as the beginning/end for trains going towards Honolulu or Ewa? Please elaborate.

27. Could the Airport Rail Loop end at Aloha Stadium and intersect the Ewa-Honolulu Rail Line at a transfer station? Please elaborate.

28. How many additional riders would take the train if stopped at Honolulu International Airport? Please elaborate.

29. How many additional riders would take the train if there were a loop around Honolulu International Airport? Please elaborate.

30. How many cars could park at Aloha Stadium during the day from Monday-Friday? Please elaborate. Please list all documents the City reviewed or wrote regarding this concept.

31. When did the City considered consider converting one or more lanes of the Nimitz near Iwilei to non-vehicular traffic only? Would this save money, using existing paved roads for the transit system?

32. Could one or more lanes of the Nimitz be used for a rail line?

33. Could the Rail Line go into Sand Island and then via a tunnel to the Homeless Shelter-Medical School area? Could a park-and-ride rail station be built in this area?

34. What is the comparative costs associated with an above ground and a below ground route through Chinatown What is the comparative costs associated with an above ground and a below ground route along the Nimitz?

35. Did the City consider a route along the Ala Moana Blvd edge of Ala Moana Park?

36. Did the City consider a route along the edge of the Ala Wai Golf Course? Why or why not? What impact would this have on ridership?

37. What ground routes did consider going to any portion of the University of Hawai'i at Manoa Campus? Why or why not? What impact would this have on ridership?

38. How many additional riders would take the train if it stopped at the University of Manoa? Why or why not? What impact would this have on ridership?

39. How many additional riders would take the train went to Waikiki? Why or why not? What impact would this have on ridership?

40. Will the rail line enable greater transportation options?

41. Will these greater transportation options lead to faster population growth rates?

42. What would be the comparable ridership levels if the rail line were build from west-to-east OR east-to-west?

43. Will the transit system be encouraged that high population densities around built around transit stations?

44. How will this impact population growth projections?

45. Will land owners around planned transit stops get new development rights which will increase their property values?

46. How much will property values rise on Oahu due to the new transit stops?

47. Which Chinatowns in the U.S. or elsewhere had overhead transit lines built?

48. How did this affect those Chinatowns?

49. What analysis has been done concerning new dark spaces created by overhead transit and any change in crime, criminal behavior or potential crime?

50. Will areas under the transit line be barbed wired to prevent homeless from gathering along the route?

51. How will the rail line impact the uses of bicycles?

52. How much money has been spent by (a) the City; (b) by contractors and (c) by subcontractors in public relations regarding this proposal?

53. Please provide a list of each government-funded or partially government-funded entity and the amount of money they spend on public relations / advertisement regarding this proposed system.

54. Will this proposed system increase or decrease the time until another major transit upgrade is needed?

55. What is the likelihood of insufficient ridership to make the system worthwhile?

56. Is the excise tax increase regressive?

Any system that is built uses energy and releases greenhouse gases (carbon equivalence) during both the construction phase and the use phase. This information can be broken down into total use/released and per rider use/release

57. In terms of building the system: How much energy will be used?

58. In terms of building the system: How much energy per anticipated rider will be used?

59. In terms of building the system: How many tons of carbon equivalence is required

60. In terms of building the system: How many tons of carbon equivalence will be used?

61. In terms of building the system: How many tons of carbon equivalence will be used?

62. In terms of operating the system:: How much energy per anticipated rider will be used?

63. In terms of operating the system:: How many tons of carbon equivalence is required?

64. In terms of operating the system:: How many tons of carbon equivalence will be used?

65. In terms of operating the system:: How many tons of carbon equivalence will be used?

66. What fuel will be used to generate the electricity necessary to build this system?

67. What form of energy will power the system?

68. Assuming the transit system is built, what is the projected rise in the use of cars over the next ten and twenty years?

69. How many blue views of the ocean from residential units will be lost as a result of this system?

70. Will the transit system lead to a rise in population along the route?

71. What percent of that population rise will be from people not currently living in the state?

72. Should Honolulu build a single linear line of a network of intersecting transit lines?

73. How much faster can Ewa grow with the transit route installed as opposed to continuing the existing process without a transit system?

74. One Congressman testified before the State Legislature that building the line will enable tens of thousands of new homes in the Ewa region. How true is that statement?

75. How will pressure to develop agricultural lands be affected as a result of this project?

76. Will this project increase or decrease the likelihood that Hawai'i will become agriculturally self-sufficient? Please elaborate.

77. Will this project increase or decrease the likelihood that Hawai'i will become energy self-sufficient? Please elaborate.

Henry Curtis
Executive Director

DEPARTMENT OF TRANSPORTATION SERVICES

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June 11, 2010

RT10/09-338277

Mr. Henry Curtis, Executive Director
Life of the Land
76 North King Street, Suite 203
Honolulu, Hawaii 96817

Dear Mr. Curtis:

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 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Life of the Land Comment 1

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/Honolulu Academy of Arts Special District. To minimize impacts on historic resources, visual aesthetics, and surface traffic, the screening process considered 15

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 (Figure 2-4).

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 could potentially affect more burial sites than any of the other alternatives considered. The alignment with at-grade operation Downtown and a tunnel under King Street, was not selected because of the environmental effects, such as impacts to cultural resources, reduction of street capacity, and property acquisition requirements of the at-grade and tunnel sections, which would cost an additional $300 million.

The Project's purpose is "to provide high-capacity rapid transit" in the congested east-west travel corridor (see Section 1.7 of the Final EIS). The need for the Project includes improving corridor transit 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 (see bullets below). 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 (or less) blocks 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 operational circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project 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 reach 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), and potential conflicts with other at-grade activity, including cars, bicyclists, and pedestrians. These effects mean longer travel times and far less reliability than a fully grade-separated system. None of these factors affects 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**—The Project will run at three minute headways. However, three-minute headways with an at-grade system would prevent effective coordination of traffic signals in the delicately balanced signal network in downtown Honolulu. A disruption of traffic signal cycle coordination every three minutes would severely affect traffic flow and capacity of cross-streets.*

Furthermore, there would be no option to increase the capacity of the at-grade rail system by reducing the headway to 90 seconds, which would only exacerbate the signalization problem. An at-grade system would require removal of two or more existing traffic lanes on affected streets. This effect is significant and would exacerbate congestion. 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 with the elevated rail, and, in fact will reduce system-wide traffic delay by 18 percent compared to the No Build Alternative (Table 3-14 in the Final EIS). The elevated guideway will require no removal of existing through travel lanes, while providing a 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.

An at-grade light rail system with continuous tracks in-street would create major impediments to turning movements, many of which would have to be closed to eliminate a crash hazard. Even where turning movements are designed to be accommodated, at-grade systems experience potential 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 (e.g., Phoenix, Houston, LA). This potential would be high in the Chinatown and Downtown neighborhoods, where the number of pedestrians is 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 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 impacts to sensitive cultural resources. In addition, the extra roadway lanes utilized by an at-grade 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, prolonged exposure to construction noise, and traffic impacts.*

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 further analysis.

As stated previously, the short 200-foot (or less) blocks in Downtown Honolulu would permanently limit the system to two-car trains to prevent stopped trains from blocking vehicular traffic on cross-streets. Even with transit signal priority, the at-grade speeds will be slower and less reliable than an elevated guideway. Under ideal circumstances, the capacity of an at-grade system could reach 4,000 passengers per hour per direction, assuming optimistic five minute headways. Based on travel forecasts, the Project should support approximately 8,000 passengers in the peak hour by 2030. Moreover, the Project 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 reach 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.

Life of the Land Comment 2

As discussed in the response to Comment 1 in this letter, 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue were considered during the screening process. Five different alignments through Downtown were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street and a tunnel under King Street. The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion regarding the at-grade alignments considered. The reference sections of these reports list other resources that support the alternatives analysis.

Life of the Land Comment 3

Enhanced bus service was considered during the Alternatives Analysis Phase (referred to as the Transportation System Management (TSM) Alternative). As discussed in Chapter 2, Section 2.2.2 of the Final EIS, the TSM Alternative was designed to serve the study corridor based on a hub-and-spoke network of bus routes, similar to today. The alternative included express bus service that operated as bus rapid transit in existing facilities. Bus frequencies would have been increased during peak periods to provide improved service for work-related trips, particularly from developing areas such as Royal Kunia, Koa Ridge, and Waiawa. The bus fleet was assumed to increase from 525 to 765 buses, and park-and-ride lots were assumed at West Kapolei, UH West Oahu, Waipio, and Aloha Stadium. In addition, the present a.m. peak-hour-only zipper lane would have been modified to operate in both the a.m. and p.m. peak periods, and relatively low-cost improvements would have been made on selected roadways to give priority to buses.

The analyses found that the TSM Alternative would have improved transit travel times somewhat by reducing the amount of time riders would have to wait for a bus to arrive at a bus stop. As a result, the TSM Alternative would have led to a slightly larger number of daily transit trips than the No Build Alternative (Table 2-2). This alternative would have generated fewer hours of transit-user benefits than either the Managed Lane or Fixed Guideway Alternative. Since most buses would still operate in mixed traffic, the TSM Alternative would have done little to improve corridor mobility and travel reliability. Roadway congestion also would not have been alleviated. In addition, because of the dispersed nature of transit service, slow bus

speeds, and unreliable service, the TSM Alternative would not have supported the City's goals of concentrating growth within the corridor and reducing development pressures in rural areas.

In terms of its environmental impacts, the TSM Alternative would have generated fewer physical impacts than the Managed Lane and Fixed Guideway Alternatives. However, it would have required more transportation system energy and generated more air pollutant emissions and water pollution than the Fixed Guideway Alternative (Table 2-3). Although the TSM Alternative would have been very cost-effective, financial feasibility was a concern. Currently, State legislation does not allow the local excise and use tax surcharge to be used for enhancement of the existing bus transit system.

Life of the Land Comment 4

The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion on the TSM Alternative, including results of the analysis. The reference sections of these reports list other resources that support the alternatives analysis, including analysis of the TSM Alternative.

Life of the Land Comment 5

As discussed in the response to Comment 1 in this letter, 15 combinations of tunnel, at-grade, or elevated alignments between Iwilei and Ward Avenue were considered during the screening process. Five different alignments through Downtown were advanced for further analysis in the Alternatives Analysis, including an at-grade portion along Hotel Street and a tunnel under King Street. The Alternatives Analysis Report (2006) and the Alternatives Screening Memorandum (2006) provide a discussion regarding the at-grade alignments considered. The reference sections of these reports list other resources that support the alternatives analysis.

Life of the Land Comment 6

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 operates 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. However, this would prohibit at-grade access to the future development. Placing any part of the system in mixed right-of-way would affect reliability of the entire system as described above.

Life of the Land Comment 7

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. That flexibility does not exist in Honolulu.

Life of the Land Comment 8

To meet system requirements as outlined in Section 2.5.1 of the 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. As discussed above, an at-grade system was found not to be feasible therefore an investigation of right-of-way on specific streets for an at-grade system was not conducted.

Life of the Land Comment 9

The Project follows Farrington Highway, not H-1 in the Kapolei-Ewa area. During the Alternatives Analysis process, the Hawaii State Department of Transportation (HDOT) informed DTS that all of the H-1 right-of-way needs to be preserved for future freeway use.

Life of the Land Comment 10

Farrington Highway lanes could not be used for a rail line. One of the project design requirements is operation in an exclusive right-of-way. Using lanes on Nimitz Highway would create pedestrian-vehicle conflicts. In addition, reducing the number of travel lanes would worsen congestion for highway users.

Life of the Land Comment 11

At-grade operation would require a fenced right-of-way. Cross-streets and local access along Farrington Highway would preclude at-grade operation in Waipahu.

Life of the Land Comment 12

The Project alignment goes directly through the mauka portion of the Leeward Community College (LCC) campus and includes a station at LCC. A spur was not considered. The alignment follows this route because it serves the LCC campus and other nearby activity centers and provides access to the preferred maintenance and storage facility, which is located adjacent to LCC. Details about the alignment selection can be found in the Alternatives Analysis Report (2006).

Life of the Land Comment 13

The fixed guideway Project will serve LCC. Figure 3-9 in this Final EIS shows 190 passenger boardings and 700 alightings at this station during the a.m. two hour peak period (6 a.m. to 8 a.m.). Figure 3-10 shows 3,200 daily boardings and alightings.

Life of the Land Comment 14

The Project will serve Central Oahu 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 the Final EIS.

Life of the Land Comment 15

The Waipio area will be served by the fixed guideway station in Waipahu with buses serving the surrounding communities. Figure 3-9 in the Final EIS shows 1,050 passenger boardings and 350 alightings at this station during the a.m. two hour peak period. Figure 3-10 shows 3,080 daily boardings and alightings. A spur line to Waipio has not been evaluated.

Life of the Land Comment 16

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 in this Final EIS) that will be accessible via a direct off-ramp from H-2. Figure 3-7 in this Final EIS shows that travel times will be reduced for those traveling from Mililani to Downtown using the fixed guideway system for a portion of their commute. A spur line to Mililani has not been evaluated.

Life of the Land Comment 17

The Kamehameha Highway right-of-way abuts private property and construction of even one rail track on the makai side of this road would require acquiring right-of-way near Pearl Highlands Center, Pearl City Shopping Center, and the Pearl Ridge Shopping Center. These locations will be instead served by an elevated guideway system, which minimizes the amount of right-of-way needed in this area.

Life of the Land Comment 18

The Kamehameha Highway right-of-way abuts private property and construction of even one rail track on the mauka side of this road would require acquiring right-of-way near Pearl Highlands Center, Pearl City Shopping Center, and the Pearl Ridge Shopping Center. These locations will instead be served by an elevated guideway system, which minimizes the amount of right-of-way needed in this area.

Life of the Land Comment 19

There is sufficient space for an elevated guideway makai of the Airport Viaduct. Ewa of Aolele, the Project is makai of the H-1 and Nimitz Highway interchange. Koko Head of Aolele, it

would be difficult to cross over the airport access ramps, and fewer riders would be served than with the proposed alignment serving the Airport along Aolele and Ualena Streets.

Life of the Land Comment 20

All land on both sides of Kamehameha Highway near the Pearl Harbor Naval Base is controlled by the Federal government, and much of it contains historic resources. There is insufficient land makai of Kamehameha Highway for a rail line and/or station at-grade. The Pearl Harbor Naval Base station will touch down on the mauka side of Kamehameha Highway at Radford Drive to avoid the historic resources on the makai side.

Life of the Land Comment 21

Pearl Harbor Naval Base will be served by the Project with a station at Kamehameha Highway and Radford Drive. Figure 3-9 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 shows 5,440 daily boardings and alightings. There will be bus service connecting the rail station with destinations on Pearl Harbor Naval Base.

Life of the Land Comment 22

There will be a fixed guideway station serving Pearl Harbor Naval Base. Figure 3-9 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 shows 5,440 daily boardings and alightings.

Life of the Land Comment 23

The Project will serve the Hickam Air Force Base with feeder bus service. The routes are shown in Appendix D in the 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. Due to the feeder bus system, a spur was not included in the Project.

Life of the Land Comment 24

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 fixed guideway station with feeder buses running between the fixed guideway station at the Naval Base and the Air Force Base. Figure 3-9 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 shows 5,440 daily boardings and alightings. Due to the feeder bus system, a spur was not included in the Project.

Life of the Land Comment 25

As discussed in Chapter 3, Section 3.4.6, and in Appendix B to the Final EIS, the rail line will provide access to Honolulu International Airport. There will be a rail station on Airport property near the overseas parking garage just Ewa of the parking garage exist lanes, fronting Ala Onaona Street. The station will be about 600 to 800 feet from the interisland and overseas terminal and ground level pedestrian walkways will connect the station to the terminals.

Figure 3-10 in this Final EIS shows daily boardings at the Honolulu International Airport Station (3,260 boardings and 3,060 alightings).

The line will not displace roadways or vehicles from the Airport; hence, security will not be affected by displacement of vehicle access. As the rail line will not affect roadway access or operations, it will not cause congestion or idling of vehicles.

Life of the Land Comment 26

The Project provides a direct connection between Ewa and Honolulu via the Honolulu International Airport. Therefore, the addition of a loop at the Airport is not necessary.

Life of the Land Comment 27

The Project connects between Ewa and Honolulu via the Honolulu International Airport with stations located at Aloha Stadium, Pearl Harbor Naval Base, and Honolulu International Airport. As a result, the loop as described in your comment is not necessary.

Life of the Land Comment 28

The fixed guideway system will serve Honolulu International Airport with a station directly located on airport property, as described in response to Comment 25 (above). Figure 3-9 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 shows 3,260 boardings and 3,060 alightings at this station.

Life of the Land Comment 29

The Purpose and Need of this Project is discussed in Section 1.7 and 1.8 of the Final EIS. Any questions about Airport plans to provide shuttle service around the airport should be directed to the Hawaii 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 ridership projections for the alignment are the lowest figures of the evaluated alignments.

Life of the Land Comment 30

According to Table 2-8 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 the Final EIS). Design for all Project stations is currently in the preliminary design stage. All coordination letters can be found in Appendix F of the Final EIS.

Life of the Land Comment 31

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. Please see response to Comment 1 for a discussion of the effects of an at-grade system.

Life of the Land Comment 32

Using lanes on Nimitz Highway for a rail line would not be feasible as this would create potential conflicts between the train and pedestrians and other vehicles. In addition, reducing the number of travel lanes on Nimitz Highway would worsen traffic congestion.

Life of the Land Comment 33

A future rail line and park and ride could be constructed to Sand Island but it is not part of this Project. However, the Project does not include a rail line to Sand Island or a park-and-ride in this area. The Project travels along Dillingham Boulevard and transitions to Nimitz Highway at Kekaulike Street, which is Koko Head of Sand Island.

Life of the Land Comment 34

A below ground route on Nimitz Highway was never evaluated. Since Nimitz Highway runs along the water front, a below ground route would be below the water line, which would add significant cost to construction. Table 5-2 in the Alternatives Analysis Report shows the cost of a below ground route through Chinatown along King Street would cost $1,900 million in 2006 dollars (the year the alternative was evaluated) for just that segment between Iwilei and UH Manoa. This was the most expensive alignment evaluated between Iwilei and UH Manoa. The ideal above ground alignment studied in this area was estimated to cost $1,230 million in 2006 dollars.

Life of the Land Comment 35

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

An alignment along Ala Wai Boulevard is discussed in the Alternatives Screening Memo. This report states that the aesthetic impact of an aerial structure along Ala Wai Boulevard and the Ala Wai Canal would be severe. As a result, it was not considered further as part of the Alternatives Analysis phase.

Life of the Land Comment 37

The Screening Memo discusses the elevated routes that were examined between Ala Moana Center and UH Manoa. At-grade routes to UH Manoa were not considered due to the impact to existing travel lanes and potential conflicts with pedestrians, bicyclists and drivers. This area of the corridor is very congested and an at-grade alignment would have required removal of traffic lanes, which would have resulted in increases in traffic congestion.

The Project will serve the UH Manoa 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 Section 3.4.2 of the Draft and Final EISs. Additionally, Table 3-29 in this Final EIS shows that the potential rail extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa would increase fixed guideway ridership by approximately 25 percent in addition to 116,000 ridership estimated for the Project.

Life of the Land Comments 38 and 39

City Council Resolution 08-261 identified the Airport Alternative from East Kapolei to Ala Moana Center as the preferred alternative. Table 3-29 in this Final EIS shows that the potential extensions to West Kapolei, Salt Lake Boulevard, Waikiki, and UH Manoa 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 will be provided until the fixed guideway extensions are implemented. Projected transit ridership with the future extensions (West Kapolei, Salt Lake Boulevard, UH Manoa, and Waikiki) are provided in Table 3-29 of the Final EIS.

Life of the Land Comment 40

The fixed guideway Project will provide greater transportation options. Currently, people on Oahu can travel by private automobile, TheBus, bicycle, or walking. The fixed guideway Project will add another option. Since the fixed guideway vehicles will be completely separated from roadway traffic operations, the Project will provide higher transit service reliability compared to the No Build Alternative.

Life of the Land Comment 41

After completion of construction, the Project will not decrease or increase regional population or the number of jobs; however, it will influence the distribution, rate, density, and intensity of development in the study corridor. Without the Project, growth is more likely to be dispersed outside of the study corridor, including in undeveloped areas of Central and North Oahu.

Life of the Land Comment 42

As described in Section 2.5.10 and further in Section 8.6.9 in the 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. Therefore, construction will begin between East Kapolei and Leeward Community College. The Project will be constructed in phases to accomplish the following:

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

- *Match the rate of construction to what can be maintained with local workforce and 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.

Ridership numbers would be higher if construction started on the Koko Head end of the line, however, the lack of available space for a maintenance and storage facility on that end of the corridor makes such phasing unfeasible. Figure 3-9 and Figure 3-10 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 once the entire Project is in operation.

Life of the Land Comment 43

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 the Project will 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

As discussed in Section 4.19.2 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

The Project will not change any zoning or other development rights. Questions pertaining to development rights should be directed to the City's 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

According to Section 4.19.2 in this Final EIS, experience in other cities indicates that property sales values increase by $60 to $2,300 for every 100 feet closer to a transit station (see Table 4-38 in this Final EIS). The effect cannot be isolated from other market forces; therefore, the precise effect of the transit system cannot be determined.

Life of the Land Comment 47

Elevated transit systems that serve various Chinatowns have been built in Chicago, Boston, Los Angeles, Manila and Singapore.

Life of the Land Comment 48

Each of the cities listed in Life of the Land Comment 47 is unique and the introduction of transit has affected each differently. Generally, Chinatowns are located in relatively dense urban areas near downtown and therefore have benefited from access to transit.

Life of the Land Comment 49

Section 4.8.3 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 one serious offense for every one 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. Crime rates on transit systems are correlated closely with crime rates in the neighborhoods within which the stations are located (e.g., "Crime in public transit systems: An environmental design perspective", Adele Pearlstein and Martin Wachs).

Life of the Land Comment 50

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

Several fixed guideway stations will 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 will have facilities for parking bicycles, and each guideway vehicle will be designed to accommodate bicycles, as regulated by a bicycle policy to be developed by the City. Locations where potential effects on bicycle facilities could occur are shown in Table 3-25 in this Final EIS.

Life of the Land Comments 52

Public involvement (e.g., conducting public meetings, providing project information, and requesting public comments,) is an integral and essential part of the project planning process. Guidelines set forth by NEPA, and Chapter 343 of the Hawaii Revised Statutes stipulate that public involvement be carried out on large-scale projects such as the rail project. Thus, a broad range of print and visual media, including presentations, was employed to reach multiple population segments and is described further in Chapter 8 of the Final EIS.

Life of the Land Comments 53

The project team does not have information of the expenditures of other government-funded entities.

Life of the Land Comment 54

The Project will provide high-capacity transit service between East Kapolei and Ala Moana Center. The Project will connect multiple activity centers, provide cost-effective transit user benefits, and meet the Purpose and Need for the Project. This Project provides significant passenger capacity, which could be easily increased in the future by adding additional vehicles or decreasing headways. As a result, this Project will increase the time until another major transit upgrade is needed.

Life of the Land Comment 55

Ridership projections for the forecast year of 2030 have been developed using a travel demand model calibrated against collected traffic and transit ridership information and then validated against recent counts to be sure it properly represents travel activity in the transportation system (Section 3.2.1 of the Final EIS). An on-board transit survey was completed in December 2005 and January 2006, and the latest socioeconomic information available as of October 2008 was incorporated. Traffic counts were collected in 2005, 2007, and 2008. 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 116,300 trips per day are expected to use the rapid transit system on an average weekday in 2030. Since the Draft EIS was published, the travel demand model has been refined by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes (driving alone or car pooling) to project stations and recognizing a more robust off-peak non-home-based direct demand element (trips that do not originate or end at home) based on travel surveys in Honolulu.

Ridership is projected to reach 116,000 in 2030. This figure includes approximately 40,000 passengers who would otherwise have had to drive on the roadways. The forecasts show 88,000 riders when the full system opens in 2019. Honolulu is one of the first projects in the country to design and undertake an uncertainty analysis for this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. 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. Given all the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day.

Life of the Land Comment 56

The General Excise and Use Tax (GET) is regressive and applied to all transactions. The GET is discussed in Section 6.3.2 of the Final EIS.

Life of the Land Comment 57

Section 4.18.6 of the Final EIS indicates that approximately 7.5 trillion BTUs will be required to construct the Project.

Life of the Land Comment 58

As shown in Table 3-18 in this Final EIS the fixed guideway will carry approximately 116,000 persons daily or approximately 36 million riders per year in 2030. Section 4.18.6 indicates that approximately 7.5 trillion BTUs will be required to construct the Project.

Life of the Land Comments 59, 60, and 61

The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project will 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 will be generated from construction.

Life of the Land Comments 62, 63, 64, and 65

The energy required to construct and operate the system is presented in this Final EIS. Table 4-21 in the Final EIS indicates that 1,690 million BTUs will be consumed daily in 2030 to power the Project, while the daily roadway energy consumption will decrease by 3 million BTUs daily in 2030 as a result of the operation of the system.

The energy consumed could be from multiple sources. However, assuming all energy is generated from oil, the Project will have a carbon equivalence of about 20 metric tons of carbon per billion BTUs consumed (U.S. Department of Energy, Transportation Energy Data Book). Project construction will consume approximately 210 million BTUs per annual rider. Using the estimated energy calculation provided in Comment 58 (above), construction will generate about 4 metric tons of carbon equivalence per annual rider.

Life of the Land Comment 66

The energy mix for electricity generation will depend on HECO's power production. The State of Hawaii 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 Hawaii was from renewable sources.

Life of the Land Comment 67

As stated in Section 2.5.2 in this Final EIS, the system will be powered by electricity.

Life of the Land Comment 68

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 traveled), VHT (vehicle hours traveled), 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). The use of cars in the next 10 and 20 years will be less with the Project than if the Project were not constructed.

Life of the Land Comment 69

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 by the Project in a particular way. Because it is an elevated guideway, views below and above the guideway will still be available.

Life of the Land Comments 70 and 71

The transit system will provide a transportation alternative to residents. It is not planned to change the rate of population growth on Oahu. As described in Section 4.19.2 in this Final EIS, the Project will not increase or decrease regional population or the number of jobs; however, it will influence the distribution of the development, especially near transit stations. It is not possible to predict the number of people relocating to Hawaii from other states.

Life of the Land Comment 72

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

The transit system will provide a transportation alternative to residents. It is not planned to change the rate of growth on Oahu.

Life of the Land Comment 74

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 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 Oahu's 'second city.' The terminal station in the west end of the Project is at East Kapolei. The west end of the Project will 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. As described in Section 4.19.3 of the Final EIS, current land use plans anticipate extensive development of the Ewa plain irrespective of whether or not the Project is built. Thus, the Project may have the effect of intensifying land use in the areas near the planned stations; however, the overall development plan will not be substantially altered by the Project. The State of Hawaii prepared an Environmental Assessment (EA) of the effects of two major transportation projects, the North-South Road and Kapolei Parkway in the Ewa area. The evaluated growth-inducing and cumulative impacts of the projects under the Hawaii Environmental Policy Act, see EA § 3.15.4.

Life of the Land Comment 75

The Project resulting in any substantial change in agricultural self-sufficiency would be speculative. As detailed in Section 4.2 in this Final EIS, the Project will require some farmland that is currently owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan. For more detail, see Section 4.19. and Section 4.2.3 of the Final EIS.

Life of the Land Comment 76

As stated in Chapter 4, Section 4.2.3 of the Final EIS, the farmlands that will be acquired for the Project are in the Ewa Plain. The Ewa Development Plan designates areas for dense development while preserving other areas for agriculture. A maximum of 80 acres of prime farmland and 8 acres of statewide-important farmlands will be acquired by the Project, of which 70 acres are actively cultivated. All of the affected properties designated as prime, unique, or of statewide importance and/or actively farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan.

The 88 acres of agricultural impacts includes land needed for a maintenance and storage facility. One of the two site options for a maintenance and storage facility is in agricultural-related use (Aloun Farms) near Hoopili. The other potential site option is located near Leeward Community College and is the site of a former Navy fuel storage and delivery facility. The Leeward Community College location is the preferred site for the maintenance and storage facility, and the City has been working with the Navy to acquire it. If the City can acquire this site, only 47 acres of land designated as prime or of statewide importance will be used for the Project. Aloun Farms' headquarters, located at the Hoopili site, would not have to move if the Leeward Community College location is used.

Life of the Land Comment 77

As detailed in Section 4.11 in this Final EIS, total transportation energy consumption will decrease as a result of the Project. Combined with the State of Hawaii's commitment to

renewable electricity production, the system will 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, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure

UltraSystems
environmental•management•planning

February 6, 2009

Mr. Ted Matley
U. S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
630 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the Honolulu High-Capacity Transit Corridor Project

Dear Messrs. Matley and Yoshioka:

UltraSystems Environmental (UltraSystems) was retained by Kamehameha Schools (KS) to conduct an independent review of the subject DEIS and companion technical reports, and to prepare the following findings and comments. (KS is preparing its own comments and sending them in a separate letter.) UltraSystems is one of the leading environmental planning and consulting firms in the western United States, and has extensive experience in preparing technical studies and environmental documents. Its services include environmental analyses, air and noise impact studies, transportation, biology and wetlands, Phase I and II environmental site assessments, hazardous materials management, and land use studies.

UltraSystems has a distinguished track record in preparing high-quality environmental documents for residential, commercial, industrial, institutional, transit, transportation, and infrastructure-related projects for public and private sector clients throughout California and the western United States. Each of our six principals brings more than 30 years of experience in the preparation and peer review of environmental documents.

Besides reviewing the DEIS, UltraSystems reviewed the guidance provided by the Federal Transit Administration on preparing project Environmental Impact Statements;[1] the *Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report, City and County of Honolulu;* Hawaii Revised Statutes, Chapter 343 (Environmental Impact Statements), Hawaii Revised Statutes, Chapter 344 (State Environmental Policy); and the *City and County of Honolulu Land Use Ordinance* to gain a better understanding of the planning process being followed on the proposed Project and the local land use rules and regulations that will come into play on lands impacted by the Project.

[1] "National Environmental Policy Act." Federal Transit Administration – Planning & Environmental (www.fta.dot.gov/printer_friendly/planning_environment_225.html).

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The following comments summarize Project-related issues and questions that UltraSystems identified during its investigations. For your case in consideration of the comments, they are organized into nine topics. The presentation of each topic includes a general comment, followed by specific concerns.

A. Transportation

The Honolulu High-Capacity Transit Corridor project may create significant construction and operational traffic, roadway and parking impacts on adjacent KS-owned land that have not been adequately quantified and the proposed mitigation measures lack specificity or evidence that they will effectively reduce impacts to property owners and businesses.

Concern #A-1: Planned Parking Appears to be Insufficient and May Result in "Spillover" to Adjacent Commercial Properties

- The proposed Pearl Highlands Station would have a 1,600-space park-and-ride facility (DEIS, Page 2-27). Should additional parking be needed in the future, will sufficient space be available to expand the park-and ride lot? If insufficient parking is provided, those driving to this station will be forced to seek parking elsewhere.

- Dedicated kiss-and-ride pullouts (passenger drop off) or parking spaces are planned at many stations to facilitate drop-off and pick-up (DEIS, Page 2-36). No additional parking is shown for the Kapalama Station (DEIS, Page 2-31, Figure 2-31). Given that there appear to be no residences within the standard quarter-mile walking radius, it is reasonable to assume that riders will drive to this station—and need parking—or that few riders are expected at this station because it may be easier to simply drive into town from there. Please confirm if this station is intended to have fewer than average riders. If it is expected to have average per-station ridership, then please explain how parking demand will be handled if the City plans on drawing many riders from this area. If off-street parking is planned for this station, then please provide the parking report for public review. If off-street parking is not planned for this station, then please provide a report explaining the reasons for the expected low ridership at this station—and which stations are expected to carry the heavier rider loads. When showing the heavier rider loads please include in the report the number of riders expected there and the number of parking spaces required. Also, if people do end up riding from this station and parking, please provide a written plan showing how they will be accommodated so as to not have a negative impact on commercial tenants near this station.

- Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road due to fixed guideway column placement in the median (Transportation Technical Report, Table 5-54, page 5-114). Commercial properties a few blocks west of the proposed Kapalama transit station will be affected.

- Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114). The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. (KS-owned land is on both sides of this section - McNeill to Kohou). What impact would the loss of these off-street parking spaces have on the commercial uses along Dillingham Boulevard?

- For the Kaka'ako station, 16 on-street Mauka and 22 on-street Makai parking spaces would be lost on Halekauwila Street between Keawe Street and Coral Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114; see also DEIS Page 2-32, Figure 2-35). Please describe the impact from the loss of these on-street parking spaces on businesses located on KS-

owned properties and where those spaces could be replaced? This site is likely to be an a.m. net destination station more likely to have less parking demand than a net ride generating station.

- The *Transportation Technical Report* states that park-and-ride usage would be free (Section 5.6.2, page 5-86). It is a common experience throughout California that parking at transit stations is underestimated, and consequently, additional parking is often required after the initial construction, to meet the increased demand. This was certainly the case at UltraSystems' home base of Irvine, California, where a three-story parking garage was recently built for the Irvine Amtrak/Metrolink station, after the capacity of the original surface parking lot was exceeded. Based on this premise, land for more parking would likely have to be acquired. The Final Environmental Impact Statement (FEIS) for the Project should address the question of how the construction and maintenance costs for these additional facilities would be paid for. The FEIS' cash flow and budget should address this.

- The following additional mitigation measures for parking impacts should be included in the FEIS:

  - ✓ The foundations of parking garages for transit and bus patron parking shall be designed and constructed so that additional floors could be added as needed in the future.

  - ✓ Where parking structures are not planned to be built, enough land shall be acquired by the City and County of Honolulu so that surface lots can be expanded as necessary to handle future increases in parking requirements. It will be less costly to reserve the land now, rather than when the demand becomes acute.

Concern #A-2: Elimination or Narrowing of Existing Traffic Lanes May Result in Safety Problems

- In some cases, widening the existing street median to accommodate the columns for the fixed guideway would require reducing lane widths slightly. Table 3-21 (Column Placement Effects on Streets and Highways – page 3-39 of the DEIS) shows where columns would be placed and the new widths of traffic lanes on certain street segments. However, with only one exception, the table does not report the widths of the traffic lanes under the No Build Alternative.[2] Therefore, the extent of change in lane widths is not known. Although the transportation technical report reports historical accident rates, it and the DEIS are silent on the issue of impacts of lane width changes on road safety. **UltraSystems requests that a fully documented analysis of the effect (if any) of lane width reduction on traffic accident rates be included in the FEIS.**

- The FEIS should address the issue that the narrower lanes are likely to affect the operation of larger vehicles such as semi trucks and buses and create safety hazards. Operating large vehicles in 10 foot wide lanes may create an unreasonable risk of automobile accidents in these lanes and of risk to people and business near these rights-of-way.

- Along three street segments (Dillingham from McNeill to Waiakamilo, Halekauwila from Keawe to Coral, and Halekauwila from Punchbowl to South Street), sidewalks will be narrowed by one to five feet (DEIS, Table 5-57). Narrowed sidewalks can reduce bicycle and pedestrian safety, as sidewalk users would be moved closer to automobile traffic.

[2] Information on existing lane widths is also lacking in the transportation technical report.

Concern #A-3: The impacts on traffic near the park-and-ride facility at the Pearl Highlands Station may not be sufficiently mitigated by the measures proposed in the DEIS.

Table 3-22 (Effects on Traffic near Park-and-Ride Lots – 2030 No Build and Build Alternatives) shows that the level of service (LOS) will remain at F for two intersections near the Pearl Highlands Station under the No Build and Build Alternatives. At a third intersection (Farrington Highway and Waiawa Street), the p.m. peak hour LOS will decline from D under the No Build Alternative to F under the Build Alternatives. Except for one instance (p.m. peak hour at Kamehameha Highway and Kuala Street), delays at all the intersection will be greater under the Build Alternative than under the No Build Alternative. According to the DEIS, potential mitigation measures include widening existing roads, signalizing intersections, and "other treatments." This raises some questions that need answering in the FEIS:

- What is the approximate amount of mitigation (in seconds of delay, for example) that would be expected from road widening and signalizing intersections?
- The term "other treatments" is too vague; what are some of them, and how effective would they be?
- Could the incorporation of feeder buses in the project design provide additional mitigation?

B. Safety and Security

Construction and operation of the transit project will create significant safety and security problems at the proposed Pearlridge Center, Kapalama and Kaka'ako transit stations to be constructed near of adjacent to KS-owned lands. **It is not clear from the DEIS how these problems would be addressed. Project safety features should be reviewed to determine whether they are adequate to ensure the safety of transit passengers at these stations.**

C. Land Use

Construction and operation of the transit project will impact a number of KS-owned lands near or adjacent to the Pearlridge Center and Kapalama stations and along Dillingham Boulevard, particularly in the Dillingham Plaza Area. The reduction in the size of KS owned parcels in these areas may result in the creation of existing, non-conforming uses that may hinder future redevelopment of these lands.

Concern #C-1: The loss of ten feet of land in front of commercial properties along Dillingham Boulevard, particularly in the area of Dillingham Plaza, will make land uses non-conforming and hinder future redevelopment.

- The loss of 10 feet of land in front of KS commercial-use properties will result in the loss of most of the landscaped area in front of these businesses and a number of existing mature street trees that are required by the City and County of Honolulu Land Use Ordinance.[3] Existing sidewalks in these areas will also be removed, with the sidewalks being moved back to the new edge of Dillingham Boulevard. This will result in a sidewalk/landscape area adjacent to the remaining businesses on these lands. It is assumed at this time that the loss of required lot size and landscaping will make all of these lots non-conforming, and subject to the constraints prescribed by Section 21-4.110 (Nonconformities) of the Ordinance. This may make the redevelopment of the commercial land uses on KS properties more difficult if these uses have to be brought up to the current City's current Land Use Ordinance at the time that they are developed. The FEIS should address this question and resolve it by more than providing perpetual variances, since this is also a matter of lost business opportunities caused by the impact of the Project.

[3] See Sections 21-3.110-1 (Business uses and development standards), 21-3.120-2 (Business mixed use district uses and development standards), and 21-4.70 (Landscaping and screening).

- Loss of land along Dillingham Boulevard may also impact the landscaping for off-street parking, the size of parking spaces and the loading areas for the commercial uses along this street. These changes may make these lots non-conforming due to the lack of adequate landscaping for parking and loading areas.[4] Again, future redevelopment of the commercial use along Dillingham Boulevard may be impacted, with these lots and uses considered. This is a particular concern for the Boulevard Saimin Restaurant (1425 Dillingham Boulevard), which has only twelve parking spaces, two of which potentially will be lost due to the widening of Dillingham Boulevard.

Concern #C-2: The DEIS' focus on the impacts of full acquisition of properties (i.e., change in land use, need for relocation) fails to acknowledge the impacts of partial acquisitions.

The DEIS notes (page 4-20) that "Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor would be minimal. No mitigation measures would be needed." As documented in the *Land Use Technical Report* (Pages 4-9 through 4-15), KS expressed its concern that the proposed Project's land acquisitions, including multiple partial acquisitions, may limit KS' ability to maximize the development potential of its properties.

Concern #C-3: The DEIS fails to consider sufficiently the impacts of the Project on documented future developments.

- The *Land Use Technical Report's* discussion of transit station land use impacts (pages 5-2 to 5-11) acknowledges that KS owns many properties near the proposed Kalihi, Kapalama, Kaka'ako, and Mo'ili'ili stations and has major redevelopment plans when current leases expire. **The potential impacts of the proposed transit project on these documented plans for redevelopment are not analyzed in either the Technical Report or the DEIS. This is a serious deficiency, which should be corrected in the FEIS.**

- Table A-17 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kalihi transit station, states that the City would "coordinate with Kamehameha Schools regarding redevelopment plans." The City should address these issues with KS prior to completion of the FEIS. Until such coordination is concluded, the City cannot claim that it has mitigated specific land use issues at least with respect to communities where KS owns substantial acreage at or near the proposed rail line.

- Table A-18 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kapalama station, acknowledges that "Kamehameha Schools owns much property west of" Honolulu Community College (HCC), and that "redevelopment possibilities exist a few blocks east and west." Section 3 of Table A-18, under *Refinements to Plans to Improve TOD*, states that "Coordination with Honolulu Community College (HCC) will be necessary to create strong pedestrian connection to College buildings to enhance ridership." **To not include coordination with Kamehameha Schools is a serious deficiency. KS owns over 105 acres of land in Kapalama and has ownership of land on either side of Dillingham from Waikamilo Road to Kohou.**

- Table A-28 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Mo'ili'ili station, acknowledges that KS is concerned that the height of the station will be at the 6th story of its planned building. The table also states that the City needs to coordinate with KS so the station and KS' plans "are compatible, particularly regarding pedestrian facilities." **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

[4] See City and County of Honolulu Land Use Ordinance, Sections 21-6.10 through 21-6.140.

The City and County of Honolulu shall coordinate with KS on the latter's plans to redevelop its lands near the Mo'ili'ili station in regards to the station's pedestrian facilities. Construction of this station shall not begin until this coordination has been completed and the appropriate pedestrian facilities have been included in the station's design.

D. Visual/Aesthetics/Street Trees

Construction of the transit project will create visual impacts on a number of KS-owned lands. It will also result in the removal of a number of significant street trees and other ornamental vegetation on KS lands, which will diminish the value of KS property and create significant aesthetic impacts due to changes in perception of KS property, loss of shade, screening from adjacent land uses, etc. Operation of the transit project will also create visual impacts on a number of KS tenants who will have views of the transit way and transit support columns.

Concern #D-1: The Visual and Aesthetic Resources Technical Report does not contain sufficient detail on the evaluation of impacts by "viewer groups.

The *Visual and Aesthetics Resources Technical Report* utilized the methodology of the Federal Highway Administration's (FHWA's) *Visual Impact Assessment for Highway Projects*,[5] for the proposed project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The FHWA guidelines (Page 7) state:

> "The major components of this process include establishing the visual environment of the project, assessing the visual resources of the project area, and identifying viewer response to those resources. These components define the existing conditions. We can then assess the resource change that would be introduced by the project and the associated viewer response; these allow us to determine the degree of visual impact."

The *Visual and Aesthetics Resources Technical Report* (Page 3-2), discusses how viewer groups have been categorized (i.e. residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. However, the analysis provided in Section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. **Please provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points.**

Concern #D-2: Numerous KS properties located adjacent to, or near the proposed fixed guideway system and stations would have their views impacted.

The Build Alternatives would have an elevated guideway and elevated stations throughout the study corridor. The support columns would range from 3 to 8 feet in diameter. All stations would have similar design elements, platforms that would be between 270 and 300 feet long, and a minimum of 10 feet wide. The Station height would be about 20 feet taller than the guideway. "As a result, the stations would be dominant visual elements in their settings and would noticeably change views. Systems elements for all technologies being considered would introduce new visual elements that may contrast with the existing environment's scale and character" (DEIS, Pages 4-93, 6-1 and 6-2).

- The *Visual and Aesthetics Resources Technical Report* (Page 6-1) recommends that, as a mitigation measure, project design should "incorporate elements of the Design Language Pattern Book being developed by the Project Team." KS would like to be consulted during development of the pattern book to help ensure that new stations and landscaping are compatible with existing land uses adjacent to the transit project. **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

[5] Publication No. FHWA HI-88-054.

The City and County of Honolulu shall consult with KS in the development of the pattern book that will be used in designing stations and landscaping.

Page 6-1 of the *Visual and Aesthetics Resources Technical Report* notes that impacts associated with the Build Alternative could include:

- Removal or relocation of Exceptional Trees;
- Changes in the settings of historic or cultural sites or Section 4(f) resources;
- Alteration of mauka-makai views;
- Introduction of project components that are out of scale or character with their setting;
- Moderate to high viewer response to project changes;
- Introduction of new light sources in sensitive areas; and
- Inconsistency with policy documents.

Views of the Pearlridge and Kapalama stations from KS properties are of particular concern. Tenants of KS-owned lands near or adjacent to these stations will see stations looming over them. In addition, the stations may create shading problems on adjacent lands.

Concern #D-3: The mitigation measures for visual effects lack specifics.

FHWA's visual impact assessment guidelines state, "To be relevant, visual mitigation measures must address the specific visual impacts or problems caused by project alternatives." The currently proposed mitigation in the DEIS (Page 4-93) is very general and lacks specifics as to how the mitigation measures would reduce or minimize specific visual impacts. The discussion of mitigation fails to provide a nexus as to how mitigation would address the specific visual impacts from the proposed project. In addition, the mitigation identified in the Draft EIS does not indicate any measures to mitigate construction-related visual impacts. However, the *Visual and Aesthetics Resources Technical Report* does provide greater detail regarding principles to minimize, reduce, or mitigate impacts, including those related to construction. The FEIS should include no less than the following measures:

- The City and County of Honolulu shall integrate transit-oriented development policies and principles with station designs, in consultation with developers and City, County, and State agencies before any station designs are completed;
- The City and County of Honolulu shall, in the FEIS, include a copy of the Design Language Pattern Book being developed by the Project Team and incorporate the applicable elements of the Design Language Pattern Book into the design of transit stations and landscaping;
- The City and County of Honolulu shall ensure that the final project design is aesthetically appropriate—as well as being functional;
- The City and County of Honolulu shall consult with the communities surrounding each station for input on station design elements and shall reach an agreement with all stakeholders before finalizing the station design;
- The City and County of Honolulu shall create a project design that is appropriate in scale and character to its setting;
- The City and County of Honolulu shall incorporate project design components that help create a human-scale and pedestrian-friendly environment;
- The City and County of Honolulu shall use project design features with materials and shapes that fit the topography and visual setting;
- The City and County of Honolulu shall look for opportunities to use materials that minimize the potential for vandalism;

- The City and County of Honolulu shall look for opportunities to use materials that reflect the Hawaiian culture;
- The City and County of Honolulu shall retain or replace existing street trees along sidewalks and in medians, and plant new vegetation to help soften the visual appearance of project elements (e.g., stations, guideway columns, and TPSSs);
- The City and County of Honolulu shall use source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas;
- The City and County of Honolulu shall work with relevant adjacent land owners and developers to integrate project elements with area redevelopment plans as appropriate, particularly at stations; and
- Construction-related mitigation shall include the following:
    - Removing visibly obtrusive erosion-control devices (e.g., silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized;
    - Replacing street trees and other vegetation that must be removed with appropriately sized vegetation;
    - Keeping roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking;
    - During dry periods, applying water to exposed soils to minimize airborne sediment;
    - Properly maintaining construction equipment to minimize unnecessary exhaust; and
    - Locating stockpile areas in less visibly-sensitive areas and, wherever possible, placing them in areas that are not visible from the road, or by residents and businesses.

The FEIS should provide site-specific mitigation measures for non-high-rise areas due to relatively higher visual impacts in order to adequately mitigate such impacts. This is particularly important for the Pearlridge and Kapalama stations, which would be developed near or adjacent to KS-owned lands.

Concern #D-4: The mitigation measures for removal of street trees are vague and inadequate.

The DEIS indicates that numerous street trees that would be pruned, removed, or transplanted as a result of any of the Build Alternatives. Of particular concern is the number of street trees that would be removed, including the 28 "notable" true kamani trees along Dillingham Boulevard, and how their removal would be mitigated. The mitigation provided on page 4-138 of the DEIS is vague and lacks specifics on this matter. Should street tree work such as pruning, removal or transplanting, not be done correctly, trees may become disfigured or die, creating a significant aesthetic impact on the project area, along with a need for corrective measures and their attendant costs.

- According to the DEIS, effects on street trees would be mitigated by transplanting existing trees or planting new ones. While relocating a street tree would retain the tree, the relocation of that tree would change its original environment. Therefore, more specific mitigation for areas to which existing trees would be relocated or removed is needed to ensure that these locations are appropriately mitigated. **Specifically, areas adjacent to and/or near KS properties requiring tree relocation or removal should be adequately mitigated.**

- What would happen in cases where the transplanted tree dies, as not all the proposed tree relocations may be successful? The mitigation on page 4-138 of the DEIS does not prescribe any post-transplant monitoring of relocated trees, nor does it provide any provisions for relocated trees that do not survive the transplant process.

- The DEIS contains little information on how mitigation would be determined in cases where tree removal would be required. As indicated on page 4-138 of the DEIS, "To mitigate any substantial effects in the areas that require removal, special attention would be given to developing landscape plans so that new

plantings would provide similar advantages to the community. If new plantings would not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that would, in time, develop similar benefits." Would younger trees be planted at a 1:1 ratio but older more mature trees at a higher ratio? Based on the information provided in the Draft EIS, it is unclear as to what criteria would be used to determine adequate quantities of new plantings to mitigate tree removal. The mitigation measures also do not indicate any monitoring of new plantings, or identify provisions should any of the new plantings die.

E. Noise and Vibration

The noise and vibration impact analysis in the DEIS and associated technical report is not adequately documented and does not address potentially important impacts upon commercial properties.

Concern #E-1: The noise analysis is not adequately documented.

Neither the DEIS nor the supporting technical report discusses the method by which noise levels due to the Project were calculated. It is likely that methods prescribed in FTA's *Transit Noise and Vibration Impact Assessment* manual[6] were used. Furthermore, the assumptions used to estimate noise attenuation due to the parapet wall and the wheel skirts for receptors higher than the guideway are not reported **The noise analysis in the FEIS needs to be fully documented and the assumptions and calculations need to be provided in an appendix, so that they may be checked.**

Concern #E-2: The noise analysis does not address potential impacts upon commercial land uses.

The DEIS uses the aforementioned FTA guidance's noise impact criteria as the standard against which to evaluate noise exposures due to the Project. The FTA criteria apply only for exposures to three categories of "sensitive" receptors. Category 1 includes land uses where quiet is essential, such as outdoor amphitheaters and recording studios. Category 2 includes residences and other places where people sleep. Category 3 is for "institutional land uses with primarily daytime and evening use," including schools, libraries, theaters, churches, historical sites, and parks. None of these category definitions includes, explicitly or implicitly, commercial operations. Furthermore, Hawaii State and local plans and regulations do not have standards for exposure of commercial receptors to transit noise. For this reason, the DEIS analysis did not consider impacts to commercial receptors. However, noise impacts to commercial receptors may be important in certain cases. This fact is recognized, for example, by the State of California in its *General Plan Guidelines*,[7] which include ranges of acceptable exposures for "office buildings, business commercial and professional" land uses. **It is requested that the FEIS consider the issue of noise impacts upon commercial land uses.**

Concern #E-3: The discussion of mitigation measures for noise impacts to sensitive receptors higher than the guideway is inadequate.

The noise analysis conducted for the DEIS found that "moderate" impacts (as defined by the Federal Transit Administration) would occur at several sensitive receptor locations, including some residences that are at higher elevations than the guideway (DEIS, Table 4-16). The DEIS does not specify any mitigation measures. Instead it says that "measures to reduce noise levels above the track elevation ... would be evaluated during preliminary engineering of the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts." (DEIS, pp. 4-101 and 4-107) The nearly complete deferral of the description of mitigation measures to the project engineering design stage is not acceptable under NEPA. Although it is true that Project design information is needed to determine the best mitigation measure for each predicted impact, it is

[6] U. S. Department of Transportation. 2006. Federal Transit Administration. *Transit Noise and Vibration Impact Assessment.* FTA-VA-90-1003-06. May.

[7] State of California, *General Plan Guidelines*. Governor's Office of Planning and Research, Sacramento, California (2003).

possible now to present at least a list of mitigation options that can reduce exposures to 45 or 50 dBA Ldn or below. A list of mitigation options should be included in the FEIS.

F. Construction Impacts

Construction of the transit project will create a number of impacts on KS lands along the transit corridor including interruption and/or temporary loss of access to businesses, potential temporary loss of utilities to businesses, temporary and/or permanent loss of on and off-street parking at KS businesses.

Concern #F-1: The DEIS does not adequately address left-turn closures on Farrington Highway in Waipahu during construction.

The DEIS (Page 4-153) states that left-turn lanes on Farrington Highway in Waipahu would be closed during construction. There are KS owned properties at the intersection of Farrington Highway and Waipahu Depot Road. The DEIS does not discuss the impact of the lane closures on traffic levels of the surrounding roads. It is believed that motorists will avoid the lane closure by using other alternate routes. The FEIS should include an analysis of the impacts on local businesses and KS tenants created by the closure of left-turn lanes on Farrington Highway in the Waipahu area, including the impacts of by-pass traffic. Mitigation, if necessary, should also be included in this analysis and included in the FEIS.

Concern #F-2: Proposed measures for maintaining auto access to residences and businesses during all phases of construction need to be made more specific. Additional measures are needed.

The ten mitigation measures to reduce adverse economic hardships for existing businesses along the project alignment during construction activities that are listed on page 4-154 of the DEIS should be included in the Maintenance of Traffic (MOT) Plan that would be developed by the Project construction contractor prior to construction of the Project. **However, as currently written in the DEIS, these measures are very vague and do not clearly indicate who will be responsible for implementing them. These measures should be revised to be no less than the following—and be included in the project FEIS:**

- The City and County of Honolulu, in concert with the project construction contractors, shall ensure by any necessary means that access to businesses in the project area shall be maintained during project construction activities.
- The City and County of Honolulu shall develop a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities throughout the project construction phase.
- The City and County of Honolulu shall initiate public information campaigns to reassure people that businesses are open during project construction activities to encourage their continued patronage throughout the project construction phase.
- The City and County of Honolulu shall minimize the extent and number of businesses, jobs, and access affected during project construction, by any means deemed feasible, throughout the project construction phase.
- The City and County of Honolulu, to the extent practicable, shall coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area – especially those related to seasonal or high sales periods.
- The City and County of Honolulu shall minimize, as practical, the duration of modified or lost access to businesses in the project area, throughout the project construction phase.
- The City and County of Honolulu shall provide signage, lighting, or other information to indicate that businesses in the project area are open throughout the project construction phase.

- The City and County of Honolulu shall provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio on the Island of O'ahu during the project construction period.
- The City and County of Honolulu shall coordinate with the project construction contractors the phasing of construction in each project construction area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons, throughout the project construction phase.
- The City and County of Honolulu, in concert with the project contractor, shall provide advance notice if utilities would be disrupted, during regular business hours and schedule major utility shut-offs during non-business hours.

The following additional mitigation measures to reduce this Project's impact on business access should be included in the Project FEIS.

- Prior to and during construction of the East Kapolei-Ala Moana Center Segment, the FTA and the City and County of Honolulu, Transportation Services, Rapid Transit Division (RTD) shall contact and interview individual businesses potentially affected by construction activities, and maintain appropriate records. Interviews with commercial establishments will provide FTA and RTD staff knowledge and understanding of how these businesses carry out their work, and will identify business usage, delivery, and shipping patterns and critical times of the day and year for business activities. Data gathered from these interviews will also assist the FTA and RTD as it works with the City & County of Honolulu Department of Facility Maintenance to develop the Worksite Traffic Control plans. Among other elements, these plans will identify alternate access routes to maintain critical business activities.

- The FTA and RTD shall establish a "Public Affairs Program" that will be responsible for implementing the following actions:

  - ✓ Convey construction information to the community in a timely manner so as to minimize the potential disruption to businesses.

  - ✓ Develop a process that will enable the community to "speak" to the FTA and RTD during construction that includes a specific mechanism for responding to community concerns in a timely manner.

  - ✓ All FTA and RTD responses to community concerns shall be coordinated with the construction team.

- The FTA and RTD shall work with community residents, elected officials, local businesses, and community organizations to tailor the mitigation program to meet community needs in an East Kapolei-Ala Moana Center Segment Business Disruption Mitigation Plan (BDMP) prepared by FTA and RTD staff prior to the commencement of construction activities. A copy of the East Kapolei-Ala Moana Center Segment BDMP shall be placed in the East Kapolei-Ala Moana Center Project Information Field Office for public viewing. FTA and RTD shall inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting. A quarterly status report shall be made available to the public. FTA and RTD shall appoint a staff person to work directly with the public to resolve construction-related problems.

The following mitigation measures should be minimum elements of the East Kapolei-Ala Moana Center BDMP:

1. It may be necessary to temporarily relocate immediately affected owners and occupants of businesses or provide a rent subsidy if, for example, access to the business could not be maintained or the business could not be operated in a normal manner. These options shall be explored by FTA and RTD staff if the need arises.

2. During construction of the project, FTA and RTD staff shall establish a project information field office located along the East Kapolei-Ala Moana Center Segment. The field office, in conjunction with other FTA and RTD staff, will serve multiple purposes, including:

   - ✓ Respond to and address community and business needs during the construction period,
   - ✓ Respond to complaints lodged by the public and construction claims,
   - ✓ Allow FTA and RTD to participate in local events in an effort to promote public awareness of the project,
   - ✓ Manage construction-related matters pertaining to the public,
   - ✓ Notify property owners, residences, and businesses of major construction activities,
   - ✓ Provide literature to the public and press,
   - ✓ Promote and provide presentations on the project via FTA and RTD's Speaker Bureau,
   - ✓ Respond to phone inquiries,
   - ✓ Coordinate business outreach programs,
   - ✓ Schedule promotional displays, and
   - ✓ Participate in community committees.

3. The project information offices shall be open various days of the work week for the duration of the construction period. A schedule shall be developed before project construction begins, shall be included in the East Kapolei-Ala Moana Center Segment Business Disruption Plan and shall be reported in the quarterly Mitigation Measures Status Report provided to the FTA.

4. An information and voice mail telephone line shall be available to provide community members and businesses the opportunity to express their views regarding construction. Calls received shall be reviewed by FTA and RTD staff and will, as appropriate, be forwarded to the necessary party for action (e.g., utility company, fire department, Resident Engineer in charge of construction operations). Information available from the telephone line shall include current project schedule, dates for upcoming community meetings, notice of construction impacts, individual problem solving, construction complaints, and general information.

5. The FTA and RTD shall provide multilingual advertisements for local print and radio for affected businesses, throughout the project construction phase. In addition, a multilingual construction update shall be available regularly throughout the community at least once a quarter. The languages for translation shall include, but not be limited to, English, Hawaiian, Tagalog, Japanese, Chinese, Korean, Ilokano, and Spanish.

6. The FTA and RTD shall provide affected businesses with the support needed to implement promotions to help maintain their customary level of business throughout the project construction phase.

7. The FTA and RTD shall work with establishments affected by the East Kapolei-Ala Moana Center Segment construction activities. Appropriate signage shall be developed and displayed by the FTA and RTD to direct both pedestrian and vehicular traffic to businesses via alternate routes.

8. Traffic management plans to maintain access to all businesses shall be prepared for all project construction areas.

9. Contractors shall clean work areas daily for the duration of the project construction phase.

10. Provisions shall be contained in project construction contracts to require the maintenance of driveway access to businesses to the extent feasible.

11. To the extent feasible, in the East Kapolei-Ala Moana Center project segment, concrete decking along the cut-and-cover segments shall be installed flush with the existing street or sidewalk levels.

12. Wherever feasible, sidewalks shall be maintained at their current widths during project construction. Where a sidewalk must be temporarily narrowed during construction (e.g., deck installation), it shall be restored to its current width during the majority of the construction period. Each sidewalk design will be of good quality and be approved by the FTA and RTD Resident Engineer prior to construction. Handicapped access shall be maintained during construction where feasible. If handicapped access is not feasible during project construction, then alternative handicapped access shall be provided as necessary or signs indicating that such access is temporarily unavailable shall be displayed. Handicapped access that is temporarily closed due to particular project construction activities shall be reopened as soon as possible after those construction activities have been completed.

13. Construction site fencing shall be of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation. Fence designs or samples shall be submitted to the FTA and RTD Resident Engineer for approval prior to installation. Where major boulevards must be fenced, business owners shall be offered the opportunity to request covered walkways in lieu of chain-link fencing. Where covered walkways or solid surface fences are installed, a program shall be implemented to allow for art work (e.g., by local students) on the surface(s). Where used, chain link fences shall have slats that will be maintained in good repair.

14. The project construction site shall be maintained in a neat manner, with all trash collected daily, all wood and pipes stacked neatly, and all small parts stored in closed containers.

Concern #F-3: A detailed Safety and Security Plan during construction is needed.

The DEIS (Page 4-155) states, "...During development of the Construction Safety and Security plans, measures would be identified to minimize effects on communities and their resources that address specific consequences anticipated at each location with the various communities, as well as ensure the safety of the public and environment." However, no measures are described in the DEIS. The FEIS should include a detailed Safety and Security Plan that fully explains measures that will be taken to minimize the Project's effects on communities, their resources and how the safety of the public will be ensured during Project Construction activities.

For example:

- Assuming each contractor has its own construction supplies security force, please show where the costs for such security are estimated.
- Each contractor should prepare and implement a security plan to minimize risks of creating an attractive nuisance and of theft of material and equipment—especially dangerous construction equipment.

Concern #F-4: Does the Honolulu Police Department have adequate resources to control traffic during construction?

The DEIS (Page 4-155) also states that police services could be used to control and direct traffic. How would this impact Honolulu Police Department (HPD) resources? Can HPD provide the necessary staff? What would be the impact on higher priority law enforcement activities if HPD is used to manage traffic control throughout construction? The FEIS should include an analysis of existing staffing levels of the HPD and their ability to provide staff to control and direct traffic during project construction activities and how this impacts overall staffing at HPD for other law enforcement activities.

Concern #F-5: Electric power and/or telephone service may be lost during construction.

There might be an unanticipated loss of power/telephone service to commercial properties should an unknown power or telephone line be severed during project construction activities. What assurances can be given that this will not occur and what recourse for damages will be provided should a power or telephone outage occur?

Concern #F-6: Will sufficient vertical clearance be available along Dillingham Boulevard in the Dillingham Plaza area to provide to construct the elevated transit way?

The DEIS does not address whether sufficient clearance is currently available along Dillingham Boulevard in the Dillingham Plaza area to provide for enough space to construct the elevated transit way. Dillingham Boulevard in this area is very narrow. How can cranes safely operate in this area without hitting high voltage power lines that are located on both sides of this street?

Concern #F-7: Proposed mitigation measures for air pollution during construction should be made more specific.

The control measures for air quality listed on Page 4-157 of the DEIS should be revised and expanded as follows:

- Minimize land disturbance in any one area by project construction activities.
- Use watering trucks on exposed soil surfaces to minimize dust from project construction areas at least twice a day. Watering may be required more often if any visible plume of dust drifts off any project construction site.
- Use low-emission construction equipment when feasible.
- Cover all loads when hauling soil from project construction sites.
- Cover soil stockpiles if exposed for more than seven days at a time.
- Use windbreaks to prevent accidental dust pollution, especially when construction activities are located near sensitive uses (hospitals, schools or residential areas) or near commercial areas.
- Limit the number of project construction vehicle paths and stabilize temporary roads with water or soil binders.
- Maintain stabilized project construction area ingress/egress areas.
- Wash or clean trucks prior to leaving project construction sites. Install wheel washers if necessary. Soil tracked onto streets adjacent to construction sites shall be swept once a day to remove soil tracked onto them by project construction or delivery vehicles.
- Minimize unnecessary vehicular activities, and limit vehicle traffic to 15 miles per hour on project construction haul roads.

Concern #F-8: Proposed mitigation measures for noise during construction should be made more specific.

Project construction noise will temporarily impact existing land uses on KS owned properties. Therefore, it is requested that the noise measures listed on page 4-158 of the DEIS be modified as follows in the project FEIS:

- Develop a project monitoring plan with noise limits consistent with the construction contractor's noise permit.
- Construct temporary noise barriers or curtains to shield sensitive noise receptors from project construction activities.
- Equip project construction equipment engines with adequate mufflers and intake silencers.
- Strategically place stationary equipment, such as compressors and generators as far away from sensitive noise receptors (hospitals, schools and single/multiple family residences) as possible.

G. Indirect and Cumulative Effects

UltraSystems does not believe that the transit project DEIS adequately analyzes the Project's indirect and cumulative impacts on KS-owned lands along the transit corridor.

The DEIS lacks an adequate discussion in regards to the cumulative impact of parking around transit stations and its effect on available area parking. Given that Transit Oriented Development projects will be underway near transit stations, parking could be an issue and should be discussed in the Project FEIS. KS properties may be affected by the placement of parking near stations. If parking needs are underestimated, then parking will have to be increased at a later time to accommodate the additional parking spaces needed. Since the Pearlridge and Kapalama stations are near or adjacent to KS-owned properties, the planned parking and potential future expansion of parking could impact KS-owned properties and additional full or partial takes may be needed. These cumulative impacts should be discussed in the Project FEIS.

H. Section 4(f) Analysis

The Boulevard Saimin Restaurant, a cultural resource, is located on KS-owned property fronting on Dillingham Boulevard. The Boulevard Saimin parcel would be affected by the widening of Dillingham Boulevard (by approximately 10 feet) to accommodate the fixed guideway in the median in Dillingham Boulevard. A total of 696 square feet of parking area would be necessary to allow for the construction of the Project on this street. This take of a parking area qualifies as a direct use under Section 4(f). The City's acquisition of a portion of the parking area at the Restaurant will not only have impacts on the Restaurant parking, but also parking that is used for those patronizing the many stores that are co-located in the two-story building that houses the Restaurant. It appears that two of the twelve parking spaces provided for restaurant patrons will be lost as a result of the widening of Dillingham Boulevard. **What provisions can be made to compensate for the lost parking spaces that would be taken as a result of the land take? If sufficient parking cannot be provided on or off the building site, will the whole building need to be taken, resulting in the loss of the Restaurant and the other businesses housed in this building?**

I. General Comments on Project Mitigation Measures

UltraSystems' general comment on the mitigation measures included in the Project DEIS is that many of these measures are so vague that it will be difficult to implement them. To remedy this problem, a stand-alone mitigation monitoring and reporting program (MMRP) should be prepared for the proposed as part of the FEIS. The MMRP would include the following:

- *All the mitigation measures included in the FEIS;*
- When these measures are to be implemented (e.g. during Project planning and design/Project construction/during Project operation;
- Who is responsible to see that these measures are implemented; and
- A place for a City and County of Honolulu staff member to sign-off that the measure has been completed.

UltraSystems believes that the City and County of Honolulu should appoint a monitor or monitors whose responsibility would be to ensure that the MMRP is being implemented as project construction takes place. This could be a City/County staff member. The City/County staff member could work with the Project Construction Contractor to implement Project mitigation measures. A report should be prepared annually on the status of the MMRP and what measures were implemented, including evidence that they were implemented (copies of required

permits etc.); changes to measures that were implemented; and what measures were not implemented and why they were not. The status report on the MMRP would be presented to the Honolulu City Council annually for approval.

UltraSystems has found that for mitigation measures to be implemented they must be located in a stand-alone document and be easily understandable by all parties responsible for their implementation. A commitment by a public agency is also necessary to implement all project mitigation measures, with follow up by elected officials to see that the MMRP has been implemented.

Should you have any questions concerning UltraSystems' comments in this letter on the DEIS, please call me or Bob Rusby, UltraSystems Senior Project Manager, at your convenience at 949-788-4900 or email Bob at rrusby@ultrasystems.com.

Sincerely,

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED

Betsy A. Lindsay, President/CEO

cc: Mike Dang, Kamehameha Schools
Director, Planning & Development Division

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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June 11, 2010

RT2/09-299126R

Ms. Betsy Lindsay
UltraSystems
16431 Scientific Way
Irvine, California 92618-4355

Dear Ms. Lindsay:

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

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

A. *Transportation*

Comment A-1: Parking

- *The Pearl Highlands park-and-ride facility could be expanded upward with additional floors if more parking spaces are needed. This would be decided after the entire Project is in operation and if demand warrants the additional parking spaces at this facility. While there are 4,100 spaces identified as part of the Project, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. The facilities contained in the Project are located toward the Ewa end of the route and are based on consideration of parking demand using the travel demand*

forecasting model for the year 2030. Further, the projected mode of access shares was compared to observed data from several Mainland areas, notably San Diego.

- *Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. The Kapalama Station will have relatively low ridership when compared to the guideway system average (as shown in Figure 3-10 in the Draft EIS). This station is primarily a destination and, accordingly, more people will get off the train at this station during the a.m. two-hour peak period than board. The travel demand forecasting model has been refined since the Draft EIS was published to account for non-home-based direct-demand trips (trips that do not originate or end at home) during off-peak periods. In addition, the air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport) was updated to reflect current conditions. Figure 3-9 in the Final EIS presents the revised peak-period ridership numbers for each station. As noted in Chapter 2, Section 2.5.7 of the Final EIS, a park-and-ride facility will not be included at the Kapalama Station. As stated in this section, park-and-ride facilities will be constructed at stations with the highest demand for drive-to-transit access. As shown in Table 3-22 in the Final EIS, the Kapalama station does not have high projected parking demand. Given the high quality service and passenger facilities provided at stations, the potential walk market is within one-half mile of the station as compared to the one-quarter mile noted in the comment. Most demand is expected to occur by walking, biking, or taking the bus to the station (as seen in Table 3-20 in the Final EIS). Less than 1 percent of mode of access to this station will require parking. As noted in Section 3.4.4 of the Final EIS, actual spillover parking at stations will be affected by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As shown in Table 3-22 in the Final EIS, the projected demand for spillover parking at Kapalama Station is very low. Mitigation measures will be proposed at that time to alleviate the effects of spillover parking in station areas if it develops.*

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 26 off-street parking spaces that will be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. All landowners will be paid fair-market value for the land, including the value of the parking spaces. Where landscaping, sidewalks, and driveway access will be affected by the Project, coordination will occur with the landowner, and these property features will be replaced and/or the property owner will be compensated in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. However, with the Project the need for such parking demand is reduced.*

- *Section 3.4.4 and Table 3-24 of the Final EIS identified potential effects of the Project on parking, including the 10 off-street parking spaces that will be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street. Section 3.4.7 of the Final EIS states that private, off-street parking spaces will be purchased for the Project as part of right-of-way needed along the length of the corridor in accordance with the requirements of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act. All landowners will be paid fair-market value for the land, including the value of the parking spaces. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. As stated above, the need for such parking will be reduced with the Project.*

- *Table 3-24 of the Final EIS identifies effects of the Project on parking, including on-street spaces that will be lost on Halekauwila Street. Please note that the Project no longer plans to remove any parking between Keawe and Coral Streets. Section 3.4.7 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 will not make the trip.*

- *As stated previously, the experience with park-and-ride facilities in Honolulu to date is limited. They have been generally underused. Given the history of park-and-ride use on the island, it seems prudent to evaluate any need for additional or larger facilities on the basis of empirical experience rather than commit substantial additional funding now. Any need for additional parking at the four stations with park-and-ride facilities would best be determined once experience is gained about their use. Regarding the facilities that are identified, Chapter 6 of the Final EIS includes standard cost categories for the Project, including stations, stops, terminals, and site work and special conditions. Cost estimates for park-and-ride facilities are included in the sitework and special conditions category shown in Table 6-1 in the Final EIS. Ongoing operating and maintenance costs include park-and-ride facilities at stations (see Section 6.4 of the Final EIS). Any funding needed for future park-and-ride extensions would be identified at the time those extensions are constructed.*

- *Your comments on additional mitigation measures for parking have been noted. The park-and-ride structures can be designed to accommodate upward expansion if needed. The Project will not acquire more property than what is needed. Given the history of park-and-ride usage, the purchase of additional land is not warranted until there is a verifiable need.*

Comment A-2: Traffic Lane Width

- *While Table 3-21 in the Draft EIS does not report the specific width of travel lanes under the No Build Alternative, the width of traffic lanes was considered as an information item in the level-of-service analysis. With regard to potential safety-*

related effects of reduced lane widths, a USDOT study found slightly higher accident rates associated with narrower travel lanes and shoulders[1]. However, all roadway widths will meet the standards of the American Association of State Highway and Transportation Officials (AASHTO), the Hawaii Department of Transportation (HDOT), and the City.

- *Truck traffic volumes will be considered during Final Design when determining lane widths. As discussed in Section 3.4.3 of the Final EIS, in some cases, lane widths that are wider than indicated in Table 3-21 in the Final EIS may need to be provided, although 11-foot through lanes and 10-foot turn lanes are commonly used throughout the U.S. Under any circumstances, the proposed lane widths meet AASHTO and HDOT standards and will not be a hazard for larger trucks.*

- *As stated in Section 3.4.3, 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. As noted earlier, some lane widths could increase from what is shown in Table 3-21 in the Final EIS. Permits for construction will not be approved unless a roadway facility that is safe and acceptable to the responsible transportation agency is provided. Sidewalks will meet Americans with Disabilities Act (ADA) requirements and provide a safe travel environment for users.*

Comment A-3: Park-and-ride Effects

- *With the Project, deterioration of level-of-service (LOS) will occur near some station areas. Project mitigation measures are designed to reduce the negative impact to a level that meets or surpasses 2030 No Build conditions. For example, Table 3-23 in the Final EIS shows that the level-of-service at Kamehameha Highway and Kuala Street is projected to remain at LOS F under the No Build Alternative and the Project. With mitigation measures to be implemented with the Project, including street widening and installation of signals, this intersection is projected to remain at LOS F during the p.m. peak hour and improve to LOS B during the a.m. peak hour. The average delay in seconds during the p.m. peak hour with this mitigation will be lower than that of the No Build Alternative. An impact is considered mitigated if the delay and level-of-service are improved or will be the same as the No Build Alternative. As shown in Table 3-23 in the Final EIS, the p.m. peak hour level-of-service at Farrington Highway (Ewa-bound) and Waiawa Street would decline from LOS D under the No Build Alternative to LOS F with the Project. At this location, mitigation measures include installation of signals, which will be synchronized with adjacent signals at Farrington Highway (Koko Head-bound) and Waiawa Street. With mitigation, this intersection is projected to operate at LOS B. The mitigation measures identified in Section 3.4.7 of the Final EIS and incorporated into the Project will fully mitigate the identified traffic impacts; therefore, additional mitigation measures will not be required.*

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[1] U.S. Department of Transportation, December 2000, Prediction of the expected safety performance of rural two-lane highways.

- *As discussed in Section 3.4.3 and 3.4.7 of the Final EIS, mitigation measures for intersections near the Pearl Highlands station include widening Kamehameha Highway and modifying signal timings, and improved access to the H-2 Freeway near the Pearl Highlands Station. As shown in Table 3-23 of the Final EIS, these mitigation measures will reduce the delay at the intersections around Pearl Highlands.*

- *As stated in Section 5.4.5 of the Honolulu High-Capacity Transit Corridor Project Transportation Technical Report (RTD 2008) and Addendum 02 to the Transportation Technical Report, new bus connection service will be provided to Central Oahu and North Shore communities as part of the design for the Pearl Highlands Station. Service will include feeder buses to Koa Ridge, Waiawa, and other enhanced limited-stop and peak-period express services serving Central Oahu and the North Shore. Appendix D in the Final EIS includes information on future bus routes and frequencies with the Project. These new feeder bus services are planned to provide alternative access to the guideway system. Additional mitigation measures are not needed because all project-related impacts will be fully mitigated by the measures outlined in the Final EIS and incorporated into the Project.*

B. *Safety and Security*

According to the FTA's Safety Management Information Statistics for 1997, the most recent data available in the Transportation Research Board's Report, Improving Transit Security, there was one serious offense for every one 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 and no indication that any particular issues will be created in the areas listed.

Stations will be patrolled by police, transit staff, and/or private security and will be closed at night when the system is not in operation (between midnight and 4:00 a.m.). Additionally, as stated in Section 2.5.4, of the Final EIS, security cameras that are monitored at all times of operation, audible and visual messaging systems, and an intercom link to the system operations center will also be included at all stations, park-and-ride facilities, and vehicles. The system will also 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. As discussed in this section, security measures will include Crime Prevention through Environmental Design (CPTED) 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. CPTED measures ensures that spaces are visible, open, well-lit and observable to minimize crime and will be incorporated at all stations. The City will provide maintenance to the guideway and transit facilities.

As further stated in Section 2.5.4, a project-specific Safety and Security Management Plan has been developed in accordance with FTA requirements to define the safety and security activities and methods for identifying, evaluating, and resolving potential safety

hazards and security vulnerabilities of these systems. It establishes responsibility and accountability for safety and security during the Preliminary Engineering, Final Design, construction, testing, and start-up phases of the Project. The Honolulu Police Department, the Honolulu Fire Department, the Department of Emergency Management, and the Honolulu Emergency Services Department have been involved in preparing and implementing the plan.

C. *Land Use*

Comment C-1: Dillingham Boulevard

- *As stated in Section 4.4.3 of the Final EIS, "Where relocations (either full or partial) will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow 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. For instance, minimum requirements on existing or future uses (i.e., parking requirements or setbacks) could be reduced if nonconformities occur. DTS will work with the property owner to address these concerns.*

- *As mentioned above, off-street parking on Dillingham Boulevard will be affected by the Project, as documented in Table 3-24 in the Final EIS. The City does not plan to generally replace private, off-street parking purchased and removed for construction of the Project. The City does not plan to generally replace all of the private, off-street parking purchased and removed for construction of the Project. As mentioned above, the Project will help reduce the need for such parking.*

Comment C-2: Partial Acquisitions

Please see the response for the item above. In addition, Section 4.4 of the Final EIS addresses both full and partial acquisitions.

Comment C-3: Future Development

- *The planned and reasonably foreseeable actions in the study corridor are provided in Table 4-36, in Chapter 4 of the Draft EIS and as Table 4-39 in the Final EIS and in Figure 4-2 of the Final EIS. Table 4-29 in the Final EIS includes Kamehameha Schools redevelopment plans. The assessment of their impacts, both indirect and cumulative, is presented in Sections 4.18.2 and 4.18.3 of the Draft EIS and Section 4.19 of the Final EIS. The assessment of cumulative impacts followed Federal guidance, specifically the Council on Environmental Quality's Considering Cumulative Effects under NEPA.*

- *As presented in Section 4.2.3 of the Final EIS, "Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor will be minimal. No mitigation measures would be needed." Project staff met with Kamehameha Schools on December 8, 2008 to discuss effects of the*

Project on all Kamehameha Schools' owned properties, including those near the Kalihi and Kapalama stations. As a result of the December 8, 2008 meeting, a follow up presentation was held for Kamehameha Schools and their tenants on December 18, 2008. City staff has continued communication with Kamehameha Schools, Commercial Assets Division regarding right-of-way impacts and the EIS. Coordination between the City and Kamehameha Schools will continue during project design and construction. Any mitigation required as a result of Kamehameha Schools' redevelopment plans will be developed during their redevelopment-specific impact analysis that would be performed prior to redevelopment.

- *Please see the previous response regarding coordination between the City and Kamehameha Schools regarding redevelopment plans at the Kapalama Station. As stated previously, coordination will continue.*

- *The Project includes construction of an elevated fixed guideway from East Kapolei to Ala Moana Center. A station at Moiliili could be constructed as part of future extensions. Coordination with Kamehameha Schools would occur when planning for that station occurs.*

D. Visual/Aesthetics/Street Trees

Comment D-1: Viewer Groups

The definition and description of viewer groups is provided in Section 3.1.4 of the Honolulu High-capacity Transit Corridor Project Visual and Aesthetic Resources Technical Report (RTD 2008). The following is an explanation of the terms "viewer exposure" and "sensitivity." Viewer exposure refers to the view groups' physical location, the relative number of people exposed to the view, and the duration of their view. This includes transit and highway users and people in the surrounding area. Viewer sensitivity refers to a group's expectations relative to a particular visual setting in a particular area. It is also the extent to which visual elements are important to the viewer group. Viewer sensitivity is affected by a variety of factors, including the activities a viewer in engaged in; the visual context; and their values, expectations, and interests. The assessment of visual effects in Section 4.8 of the Final EIS has considered that each viewer group, including business owners, customers, and employees, are important (see "Viewer Groups," in Section 4.8.2 of the Final EIS). The methodology for the visual assessment is detailed in Section 4.8.1 of the Final EIS. In addition, each viewer group's characteristics were considered in the assessment of visual effects for each of the viewpoints described in Table 4-9 in Section 4.8 of the Final EIS. The effects, which are noted as low, moderate, or significant, also consider each viewer group's location, duration, and distance. As stated in Section 4.8.3 of the Final EIS, in response to the viewer groups' responses, received during the Draft EIS comment period, further analysis of views and vistas has been done and the visual effects of several key views have been reevaluated.

Comment D-2: Views from Adjacent Buildings

- *Your letter accurately summarizes the visual impacts of the Project on adjacent property owners. The Project has selected a landscape architect that has prepared landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Airport, and Coastal.*

- *Further, the City and County of Honolulu 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 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.*

Comment D-3: Mitigation

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Waianae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *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.

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

Even with mitigation measures, some obstruction and changes to views will result in a high level of visual impact, or, a significant impact, and changes to some views will be unavoidable. These effects will be most noticeable where the guideway and stations are nearby or in the foreground of views.

The following bullets correspond to those in your letter under Comment D-3:

- *Regarding TOD, the Project is focused exclusively on the construction and implementation of rail transit service, which is analyzed in the Draft and Final EISs. However, as discussed in Section 4.19.2 of the Final EIS, transit-oriented development (TOD) is expected to occur in station areas as an indirect effect of the Project. The increased mobility and accessibility that the Project will provide will also increase the desirability and value of land near 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 DPP under a process covered by the City's new TOD Ordinance 09-4. The TOD special districts will encourage public input into the design of TOD neighborhood plans to reflect unique community identities. Information on the TOD process is available on DPP's website (http://honoluludpp.org/planning).*

- *The Design Pattern Guidebook is a design document, not an environmental analysis document, and is therefore not included in the Final EIS. It is available for review at the DTS office. The Guidebook reflects the sense of place in Hawaii. The guidebook is intended to create a design that is aesthetically appropriate as well as functional.*

- *DTS has developed specifications and design criteria to address the City's requirements for the Project. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscaping and streetscape improvements will mitigate potential visual impacts.*

- *The station area planning process will include public design workshops for each station area, as stated above.*

- *As stated previously, the specifications and design criteria developed by DTS address the scale and character of the Project. In addition, the ongoing station area planning process involves numerous aspects of transit system design. The planning process addresses design and planning issues in an integrated manner and focuses on the characteristics and preferences of the communities adjacent to each station.*

- *As stated in Section 2.5.5 of the Final EIS design criteria developed for stations place the highest emphasis on walk and bicycle access. The Design Criteria provide specific direction for pedestrian and bicycle access features at stations. For example, the criteria state that adequate pedestrian circulation routes shall be provided with an emphasis on avoiding pedestrian and vehicular conflicts and enabling good visibility to each station entrance. This emphasis will be complemented by distinct and clear graphic signage. For bicycle access, the criteria include language stating that racks shall be placed at the station plaza near the station entrance where public visual surveillance is possible and/or where closed circuit television monitoring is present.*

- *The Project's landscape architect has prepared the landscape architecture design criteria. Included in the design criteria are four color palettes that correspond to the four major geographic areas along the project alignment: Plains, Pearl Harbor Basin, Airport, and Coastal. Topography is included in the visual landscape. The Project will include design features, including building materials and landscaping, that will allow the Project to fit the topography and visual setting of the area. For instance, Section 4.8.3 of the Final EIS states that "Stations and park-and-ride facilities will be designed in a manner that is compatible with the surroundings."*

- *Chapter 25 of the design criteria is dedicated to the safety and security of the system. Guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effected integration between the guideway and its surrounding environment. Where the guideway columns fall within curbed areas, vines will be trained onto columns to reduce the possibility of graffiti and to soften the appearance of the structures.*

- *The design criteria also address materials that reflect Hawaiian culture. Specialty stations will be designed with respect to historic context and careful design to reinforce the uniqueness of context or use (e.g., the Kapalama Station might have a special planting of true kamani trees). The physical form of the project stations and support facilities will embody Honolulu and Hawaii's rich cultural heritage.*

- *The Project's landscape architect has prepared the landscape architecture design criteria, which includes the following goal regarding trees: "Transplant as many trees as possible displaced by the guideway to other areas of the Project that will be part of the first phase of construction or will otherwise not be disturbed by later construction." The design criteria also require the following: "Street tree planting or transplanting will occur adjacent to the station area and along the alignment where the existing streetscape is affected. Trees should be placed every 50 feet where adjacent to residential areas and every 40 feet where adjacent to commercial areas. Tree species, sizes, and details must conform to City standards." Street tree pruning, removal and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees.*

- *The station design goals include the following regarding the reduction of light pollution:*

1. Minimize light trespass from the building and site; reduce sky-glow to increase night sky access; improve nighttime visibility through glare reduction; and reduce development impacts on nocturnal environments.

2. Only provide lighting for areas that is required for safety and comfort; all non-emergency interior lighting shall be automatically controlled to turn off during non-business hours; provide manual override capability for after-hours use.

- *Criteria have been developed that will guide design of project elements. As indicated in Section 4.6.3 of the Final EIS, ongoing coordination efforts with the public will help develop design measures that will enhance the interface between the transit system and the surrounding community. The extent, nature, and location of these design measures will be determined through these coordination efforts.*

- *The measures listed in D-3 under the "construction-related mitigation" bullet of your letter are generally included in DTS's Standard Specifications for construction.*

- *It is acknowledged that the guideway and stations will noticeably contrast with smaller-sized buildings and change the character of some areas. In addition, some views Downtown and in other areas, including protected views, will be blocked, and some views will change substantially. However, the design criteria discussed in Section 4.8.3 of the Final EIS states that station designs will be context-sensitive, functionally integrated, and culturally expressive of their specific locations and where there is an opportunity, the guideway design will incorporate materials, landscaping etc. to enhance the visual environment. Overall, the Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where project elements are near existing views or in the foreground of these views.*

Comment D-4: Street Trees

- *Street trees along the project alignment are discussed in Section 4.15 of the Final EIS. Effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. More detail on mitigation measures is discussed in Section 4.15.3 of the Final EIS. Specific sites for relocating trees will be considered during Final Design when plans for new plantings are prepared by a landscape architect.*

- *In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during Final Design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.*

- *Trees that do not successfully transplant will be replaced by the contractor according to the terms of the construction contract documents. Monitoring requirements for successful restoration will be in the landscaping plan set; the responsibility is typically shared between the contractor and the owner.*

- *The details regarding specific trees planted in specific geographic areas are controlled by the landscape architecture design criteria. As indicated in Section 4.15 mitigation effects to street trees will be mitigated by transplanting existing trees to areas as close to their original location as feasible or planting new ones. Among the trees that require removal but could be transplanted are most of the trees along Farrington Highway. The location where street trees will be transplanted will be selected based on project specific criteria that could include the following:*
  - *Areas where existing landscaping will be lost along the study corridor*
  - *Areas where opportunities exist for enhancing existing streetscapes near the study corridor*
  - *Areas where stations and parking lots will be constructed*
  - *Areas where shared benefits will be accomplished, such as areas adjacent to parks or historic sites*

  Street tree pruning, removal, and planting will comply with City ordinances and will require that a certified arborist manage the pruning of any Exceptional trees. Trees suitable for transplanting displaced by construction will be relocated to a City project nursery until they can be transplanted to another part of the project area. The City will coordinate with HDOT's highway landscape architect. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

E. Noise and Vibration

Comment E-1: Noise Analysis

The noise analysis followed FTA guidance and is documented in the Honolulu High-capacity Transit Corridor Project Noise and Vibration Technical Report (RTD 2008). The results of the predicted project noise exposure levels are presented in Appendix A of this technical report. The technical report is available at libraries, from DTS, and on the project website at www.honolulutransit.org.

The methodology followed and the identification of sensitive noise receptors does not include commercial land uses as they are not noise-sensitive receptors. The FTA Noise Impact Criteria group noise-sensitive land uses into the following three categories:

Category 1: Buildings or parks where quiet is an essential element of their purpose.

Category 2: Residences and buildings where people normally sleep. This includes residences, hospitals, and hotels where nighttime sensitivity is assumed to be of utmost importance.

Category 3: Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, theaters, and churches where quiet is important.

Comment E-2: Commercial Land Uses

Impacts were evaluated to resources in these categories. Industrial and many commercial uses are not noise-sensitive. State of California guidelines are not applicable to projects in Hawaii.

Comment E-3: Noise Mitigation

As discussed in Section 4.9.1 of the Draft EIS, "Moderate noise impacts also require consideration and adoption of mitigation measures when it is reasonable." During Preliminary Engineering additional measures were evaluated. As stated in Section 4.10.3 of the Final EIS, with the recommended mitigation in place (sound absorbing material and wheel skirts), the noise analysis indicates that the new noise generated by the Project will be lower than the existing noise levels in most places. The use of these materials will mitigate all anticipated noise impacts, including those at upper building floors.

F. *Construction Impacts*

Comment F-1: Farrington Highway

As discussed in Chapter 3, Section 3.5.7 of the Final EIS, a Maintenance of Traffic Plan (MOT) will identify measures to mitigate temporary construction-related effects on transportation. The contractor will develop the MOT Plan with approval from the City and the Hawaii Department of Transportation. The MOT Plan will address roadway closures for streets identified in Table 3-27 of the Final EIS, including those listed in your letter (specifically Farrington Highway between Makamaka Place and Waipahu Deport Road). An analysis of the impacts on local businesses is not anticipated as part of the MOT Plan. However, as stated in Section 4.18 of the Final EIS, access to businesses will be maintained during construction and a public involvement plan will be developed prior to construction to inform business owners and the public of the construction schedule and activities.

Comment F-2: Access to Residences and Businesses

The Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications. These measures will be considered during the development of the specifications.

The mitigation measures proposed on pages 10-13 of your letter, unless specified otherwise below, will be utilized as part of the Project and contained within contract documents and special provisions.

- *The City will not provide direct financial assistance to mitigate temporary impacts during construction to businesses. Where acquisition of property will occur, compensation will be provided to affected property owners, businesses, or residents in compliance with all applicable Federal and State laws and will follow the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.*

- *DTS developed a community involvement plan for the Project that includes community-based staff that will work with neighborhood groups, residents, and businesses in each segment of the Project corridor. Representatives will visit businesses in each area to discuss the Project and take comments and answer questions. The MOT Plan and other construction-related plans will also be developed to minimize the impact construction will have on businesses.*

- *Every public involvement activity referenced in your letter will be undertaken during construction. An overall community involvement plan has been developed for the Project that details communications between the Project and the public. In addition, contractors hired for each construction segment will have a field office and will be required to meet with residents and businesses in the community and report to the DTS. The DTS and its contractor will jointly form a neighborhood-based plan of action to engage businesses throughout the process. The DTS sends monthly updates to the FTA regarding public involvement activities, which will continue throughout construction.*

- *The Final EIS includes commitments for community information during construction. The community information program will work with the individually affected communities. Some elements suggested for the Business Disruption Mitigation Plan, 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.*

- *The Final EIS includes commitments to maintain business access during construction. Requirements on the contractors to maintain access will be established through contract specifications.*

- *Project construction does not entail cut and cover segments. As a result, the mitigation proposed in your letter for cut and cover activity is not applicable.*

- *As stated in Chapter 3, Section 3.5.5 of the Final EIS, access to existing bicycle and pedestrian facilities will be maintained during all phases of construction as safety allows. Warning and/or notification signs of modification to bicycle and pedestrian facilities during construction will be provided. Proposed pedestrian detours will be submitted to the City for review and approval to ensure they are reasonable for all*

pedestrians and meet ADA regulations. Sidewalk widths after construction is completed are shown in Table 3-25 of the Final EIS. All sidewalk widths will comply with minimum width requirements or better.

Comment F-3: Safety and Security Plan

The City has prepared a Construction Safety and Security Manual that requires the contractor to adhere to safe construction practices. Each contractor will be required to develop a Safety and Security Plan for areas within their responsibility. The Plan will be reviewed and accepted by the City. The Safety and Security Plan will include the costs associated with those security measures.

Comment F-4: Traffic Control

Traffic control during construction is the responsibility of the contractor. The contractor will follow the MOT Plan during construction. The MOT Plan is prepared through close coordination with the City and the Hawaii Department of Transportation. As stated in Section 4.18.2 of the Final EIS, construction in high-volume traffic and pedestrian areas could employ police support to direct and control traffic and pedestrian movements to lessen effects on mobility. Safety and Security plans have been developed in coordination with Honolulu Police Department (HPD) and HPD has provided assurances that they have sufficient staff to control and direct traffic when needed. This would be funded by the Project.

Comment F-5: Electric Power and Telephone Service

As presented in Section 4.18.2 of the 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." HDOT will be involved with utility coordination for utility work in state roadways and roadway rights-of-way. The design criteria for utilities are currently contained within Chapter 8 of the Design Criteria prepared as part of the contact documents. In addition, the General Conditions require coordination with property owners regarding, but not be 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.

Comment F-6: Vertical Clearance on Dillingham Boulevard

The City has been working with Hawaii Electric Company (HECO) from the beginning of the planning and design work for this Project. All parts of the Project, including those on Dillingham Boulevard, will meet all clearance requirements for construction and maintenance of overhead cables. Given that construction will use overhead gantry systems for placement of the guideway, it will reduce the need for tall cranes. All construction systems will be properly insulated to ensure against any possible mishap.

Comment F-7: Air Quality during Construction

For the purposes of disclosure in the Final EIS, the air quality mitigation measures in Section 4.18.4 are sufficiently descriptive. As specified in this section, the Project must comply with the State of Hawaii's fugitive dust regulations, HAR 11-60.1-33, which provide more specific examples of mitigation measures. The contractor will select appropriate measures to comply with fugitive dust requirements. The following control measures will be considered to substantially reduce fugitive dust:

- *Minimize land disturbance*
- *Use watering trucks to moisten disturbed soil*
- *Use low emission equipment when feasible*
- *Cover loads when hauling dirt*
- *Cover soil stock piles if exposed for long periods of time*
- *Use windbreaks to prevent accidental dust pollution*
- *Limit the number of vehicular paths and stabilize temporary roads*

Comment F-8: Noise Mitigation during Construction

There will be temporary noise and vibration impacts during construction, as presented in Section 4.18.5 of the Final EIS. For the purposes of disclosure in the Final EIS, the noise and vibration mitigation measures presented in Section 4.18.5 are sufficiently descriptive. As stated in this section, the Project must obtain from the Hawaii Department of Health an approved community noise variance. The detailed mitigation commitments will be included in the community noise variance application and may include the measures proposed in the comment. The Hawaii Department of Health includes public involvement in establishing variance requirements.

G. *Indirect and Cumulative Effects*

As noted in Section 3.4.4 of the Final EIS, station areas with the highest estimated demands for spillover parking were at West Loch, Pearlridge, Iwilei, and Ala Moana Center. Table 3-22 in the Final EIS shows projected spillover parking demand near each guideway station. The Final EIS also notes that actual spillover parking at guideway stations will be influenced by several factors, such as availability of parking, changing conditions that will affect actual access to stations, and future development in station areas. As also noted in Section 3.4.2 of the Final EIS, ridership information for the Project is based on demand projections for 2030. The sizing of the system, including park-and-ride facilities, is based on this estimated long-term demand. When the Project is implemented, access to stations will be monitored. If park-and-ride access is higher than estimated, overall access will be reviewed, including approaches to increasing shares of other modes, such as local transit.

H. *Section 4(f) Analysis*

One parking space will be lost on the Boulevard Saimin parcel as a result of the Project. Kamehameha Schools will be compensated for this space in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act.

I. Mitigation Measures

- *All mitigation commitments will be in the Final EIS, the Record of Decision, and permits (as appropriate), and will be incorporated into the Project's Final Design.*

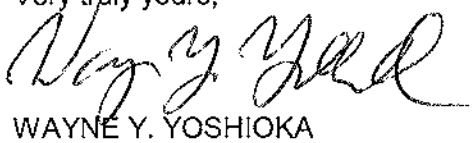
- *DTS and the construction contractor will prepare a schedule for implementation of the environmental commitments. DTS's Environmental Compliance Manager will ensure that the environmental commitments are adhered to during construction.*

- *Mitigation measures required during construction of the Project will be included in the Record of Decision and included as requirements in the appropriate construction contract documents.*

- *As the City must approve the contractors' work, the City will ensure that contractors comply with all construction and mitigation requirements.*

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure

Public Hearing Transcripts

The following letter was inadvertently left out of Appendix A; however, the response letter was mailed to the recipient:

- Bob Loy

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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HONOLULU, HAWAII 96813
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MUFI HANNEMANN
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT10/09-336962

Mr. Bob Loy, Director
Na Leo Pohai
The Outdoor Circle
1314 South King Street, Suite 306
Honolulu, Hawaii 96814

Dear Mr. Loy:

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

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

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft and Final EISs. It is acknowledged that the guideway and stations will noticeably contrast with smaller size buildings and affect the undeveloped character of the Ewa plain; however, as discussed in the Final EIS, a portion of the Ewa plain is slated for development in the future. In addition, some views in Downtown and the other areas referenced by the commenter, including protected views, will be partially blocked and some views will change substantially. Overall, the Project is set in an urban context where visual change is expected and differences in scales of structures are typical. Noticeable changes to views will occur where the project elements will be near existing views or in the foreground of these views. Viewpoints not located near the alignment or stations will generally be less

affected by changes in the visual environment because they will take in a longer, more expansive landscape.

The assessment of visual effect due to the Project as described in Section 4.8.3 of the Final EIS considers these changes to the visual landscape and viewer responses to those changes. This includes the existing development along the Project alignment. Within the Project corridor the environment changes from rural at the Wai'anae end of the corridor to dense high-rise development at the Koko Head end.

As part of the design process, the City has developed design principles, which are identified in the Honolulu High-Capacity Transit Corridor Project Compendium of Design Criteria (RTD 2009m) that will be implemented in final design to minimize visual effects of the Project. For example, guideway materials and surface textures will be selected in accordance with generally accepted architectural principles to achieve effective integration between the guideway and its surrounding environment. Landscape and streetscape improvements will mitigate potential visual impacts, primarily for street-level views.

Other measures to address visual impacts of the Project are being developed through the station design and planning process. The initial station area plans and design guidelines were first developed with coordination between DTS and the Department of Planning and Permitting (DPP). The next level of transit station design focuses on integrating individual neighborhood characteristics of the communities served by the stations.

The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- *Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- *Coordinate the project design with City TOD planning and DPP.*
- *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.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

Street trees along the Project alignment are discussed in Section 4.15, Street Trees, of the Final EIS. Twenty-eight Notable true kamani trees on the makai side of Dillingham Boulevard will be removed. Trees on the makai side of the street are already periodically pruned because of the presence of utilities. Trees on the mauka side of Dillingham Boulevard are not pruned and will be preserved. The State Historic Preservation Division has determined that the removal of 28 true kamani trees on Dillingham Boulevard is an Adverse Effect as illustrated in Section 4.15.3 of this Final EIS. The Project will not affect any trees on Kapiolani Boulevard.

Affects to street trees will be mitigated by transplanting existing trees or planting new ones, where possible. In addition to transplanting existing trees, plans for new plantings will be prepared by a landscape architect during final design to further mitigate effects to street trees. To mitigate any substantial effects in areas that require tree removal, special attention will be given to developing landscaping plans so that new plantings will provide similar advantages to the community. If new plantings will not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that will, in time, develop similar benefits.

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. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure